

GW - 13

**GENERAL
CORRESPONDENCE**

YEAR(S):

2000 - 1980



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

November 15, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. 3771-6937

Mr. David Bays
El Paso Field Services Co.
614 Reilly Avenue
Farmington, NM 87401

Re: **EPFS Burton Flats Cryogenic Plant**
GW - 013

Dear Mr. Bays:

The New Mexico Oil Conservation Division (NMOCD) has received a copy of the closure report prepared for you by Agra Earth and Environmental, Inc. for the above named facility covered by your letter dated September 16, 2000. On August 9, 2000 NMOCD performed an inspection of the site (inspection report copy enclosed). NMOCD understands that the plant equipment will remain on the site for the foreseeable future and that further investigation of the extent of the contamination is impractical due to the presence of the equipment.

The NMOCD hereby approves the closure report under the following condition:

El Paso Field Services will notify the NMOCD district office in Artesia upon:

1. Removal of the remaining plant equipment or
2. Resuming plant operations

In light of the above, the NMOCD has closed the discharge plan (GW-013) for the facility and classified the facility as inactive.

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only. No Insurance Coverage Provided)

7000 0520 0021 3771 6937

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

Postmark Here

SAFETE NM
NOV 14 2000

GW-013 EM

Recipient's Name (Please Print Clearly) (To be completed by mailer)
DAVID BAYS EPFS

Street, Apt. No., or PO Box No.
614 REILLY AV.

City, State, ZIP &
FARMINGTON, NM 87401

PS Form 3800, February 2000 See Reverse for Instructions

Mr. David Bays
GW-013 Burton Flats Cryogenic Plant
Page 2 of 2

NMOCD approval does not relieve El Paso Field Services of liability if their operations have caused contamination that poses a threat to groundwater, surface water, human health or the environment. Nor does it relieve El Paso Field Services of its obligation to comply with any other governmental rules or regulations.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Roger C. Anderson", with a long horizontal flourish extending to the right.

Roger C. Anderson
Environmental Bureau

Cc: OCD Artesia District Office

September 16, 2000

Mr. Ed Martin
New Mexico Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 88505

RE: El Paso Field Services Co. (EPFS) Burton Flats Closure

GW-013

Dear Mr. Martin:

Enclosed please find your copy of the final report covering the work recently performed at the EPFS Burton Flats Cryogenic Plant. As detailed in the report, approximately 3,000 cubic yards of hydrocarbon contaminated soils were excavated and transported to the Gandy Marley commercial landfarm for disposal.

In order not to undermine the integrity of foundations at the cryogenic plant, not all hydrocarbon contamination could be removed. The soils directly beneath both the cryogenic plant skid and products pump concrete slab were not disturbed. While there are no plans at present to remove the plant equipment, EPFS does not believe that the contaminated soils left in place represent a significant threat to the environment for the following reasons:

- The plant is inoperative, so there is no source for further leaks or spills which could cause further percolation of the contaminants.
- The bulk of the contamination has been removed.
- Excavation indicated that the hydrocarbons had penetrated to approximately 16 feet below the surface. According to data from the New Mexico State Engineer's office, depth to groundwater is over 75 feet. With no source for additional contamination it is very unlikely that groundwater could be impacted by the unexcavated material.
- The dark gray to black color of the soils excavated indicate that the process of anaerobic bacterial degradation of the remaining hydrocarbons is well established.

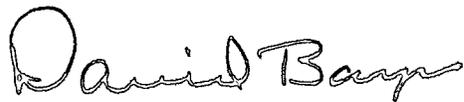
Based on the fact that the bulk of core contamination has been removed and there is no source for future spills, EPFS proposes to leave the remaining contaminated soils in place until such time, if ever, that the plant is dismantled and removed.

Mr. Ed Martin
September 16, 2000
Page 2

When the remaining plant hardware is removed, EPFS will at that time submit a proposal to collect core samples in the areas where contamination is being left in place. Results from that core sampling data can then be used to determine the extent of additional excavation required.

If you have any questions about the project, or need any additional information, please call me at (505) 599-2256.

Sincerely yours,

A handwritten signature in cursive script that reads "David Bays".

David Bays, REM
Principal Environmental Scientist

cc: Courtney Ragsdale
Mike Stubblefield (w/o attachment)

**El Paso Field Services
Burton Flats Gas Plant
GW - 013
Memo to File
August 9, 2000**

While in Artesia on another matter, I was contacted by David Bays. He requested, since I was in the area, that I go to their Burton Flats Gas Plant for an inspection prior to final closure. Courtney Ragsdale, of EPFS, met me at the site at 1:00 pm on this date and results of the inspection are as follows:

This was a very clean site for one that has been operating since 1977.

There is contamination under and around the process areas. El Paso has dug out around these areas to a depth of about 15 feet, where visual evidence of contamination disappears. Soil sample results are on the way to OCD from some of these excavations, however soil samples from the excavation on the north side of the process areas have not been taken. These will be taken soon and will be forwarded to OCD.

Equipment and buildings are to remain on the site for the foreseeable future. There is an area on the property being used to store old pipe and other junk. This will also be stored here for an undetermined period of time.

All drums and tanks have been drained.

Engine oil and anti-freeze have been drained and disposed of properly.

Due to the circumstances, I did not have the camera with me, so was not able to take any pictures. One more trip to this site is recommended for that purpose.



Ed Martin
NMOCD Environmental Bureau

Cc: David Bays, El Paso Field Services
K. Courtney Ragsdale, El Paso Field Services
Tim Gum, Artesia NMOCD District Supervisor

**EL PASO
FIELD SERVICES**

K. Courtney Ragsdale
Lead Operations Specialist
Permian Operating District
Eastern Division

El Paso Field Services Company
P. O. Box 1508
Carlsbad, New Mexico 88221-1508
Phone (505) 885-7217
Fax (505) 885-1296
Mobile (505) 390-6231

3008 E. Greene Street
Carlsbad, New Mexico 88221-1508



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

April 3, 2000

CERTIFIED MAIL
RETURN RECEIPT NO. 5050 9498

Mr. David Bays, REM
El Paso Field Services
614 Reilly Avenue
Farmington, New Mexico 87401

RE: Closure Plan for the Burton Flats Compressor Facility GW-013

Dear Mr. Bays:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of El Paso Field Services (EPFS) Closure Plan dated February 8, 2000 for the closure for the above captioned facility. **The NMOCD hereby approves of the closure plan with the following additional conditions:**

1. EPFS shall notify the OCD Santa Fe office of the disposal facility to be used prior to transport off-site of all materials assigned to a disposal facility.
2. EPFS will notify the OCD District office at least 48 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events. This notification shall be during NMOCD's normal working hours.

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

If you require any further information or assistance please do not hesitate to write or call me at (505-827-7156).

Sincerely Yours,

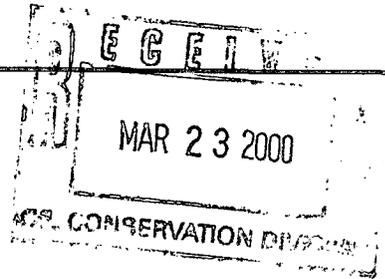
W. Jack Ford, C.P.G.
Environmental Bureau

cc: OCD Aztec District Office

U.S. Postal Service CERTIFIED MAIL RECEIPT <i>Ford</i> <i>013</i> (Domestic Mail Only; No Insurance Coverage Provided)	
Article Sent To:	
Postage	\$
Certified Fee	\$
Return Receipt Fee (Endorsement Required)	\$
Restricted Delivery Fee (Endorsement Required)	\$
Total Postage & Fees	
Name (Please Print Clearly) (To be completed by mailer) <i>D. Bays</i>	
Street, Apt. No.	
City, State, ZIP+4 <i>Farmington NM 87401</i>	
Postmark Here	

7099 3220 0000 5050 9498

PS Form 3800, July 1999 See Reverse for Instructions



Certified Mail No. Z213707691

February 8, 2000

Mr. Jack Ford
New Mexico Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505

Re: Closure Plan for the Burton Flats Plant, Discharge Plan GW-013

Dear Mr. Ford:

El Paso Field Service Company (EPFS) owns the Burton Flats Plant in Eddy County, New Mexico. The facility is located in Unit N, Section 14, Township 20 South, Range 28 East. The plant has been shut down for over a year, and EPFS currently has no plans to operate the facility in the future. Therefore, in accordance with the conditions of the facility Discharge Plan, EPFS is submitting the attached closure plan for your approval.

For any additional information you may need, please call me at (505) 599-2256.

Sincerely yours,

A handwritten signature in cursive script that reads 'David Bays'.

David Bays, REM
Principal Environmental Scientist

cc: Ross Hughes
Courtney Ragsdale
Burton Flats Regulatory File

EL PASO FIELD SERVICE COMPANY

BURTON FLATS PLANT CLOSURE PLAN

I. ENGINES, COMPRESSORS, PIPING, ANCILLARY STATION EQUIPMENT, AND FOUNDATIONS

All currently installed components are to be abandoned in place until such time that the equipment is needed at another facility. As necessary, all salvageable plant equipment will be reused by EPFS or sold for reuse in natural gas service. Any unusable equipment which is removed will be sold as scrap metal.

II. HAZARDOUS WASTE

EPFS does not anticipate generating any hazardous waste during the closure. However, any wastes generated which are determined to be hazardous as defined by EPA and NMED regulations will be disposed of off-site at a properly permitted hazardous waste disposal facility.

III. SPECIAL WASTE

A. Insulation

To the greatest extent possible, the insulation on the plant equipment will be left undisturbed. Any insulation which must be removed as part of the closure process will be tested to determine the presence of asbestos. Any regulated asbestos containing material (ACM) will be disposed of in an approved ACM landfill. Non-asbestos insulation will be disposed of off site at either a commercial or municipal landfill.

B. Used Oil

All used oil will be recycled. If an oil spill occurs, the contractor will take immediate steps to contain the spill and recover as much free liquid as is possible. Spill notifications will be made in accordance with NMOCD Rule 116.

C. Used Antifreeze

Glycol based coolants will be reused to the extent possible. If the coolant is not reusable, it will be either recycled or disposed off-site in accordance with OCD regulations.

D. Used Process Chemicals

Used process chemicals (lean oil from the absorption plant and glycol from the dehydrator) will be reused if possible. Otherwise, these materials will be disposed of at commercial disposal site which is properly permitted to handle the chemicals.

E. Unused Oil, Chemicals, and Lubricants

All unused products will be reused by EPFS or recycled if possible. Otherwise, these materials will be disposed of at commercial disposal site which is properly permitted to handle the chemicals and lubricants.

F. Oil/Hydrocarbon Contaminated Soil

Areas with minor oil or hydrocarbon staining will be aerated by turning with a disk harrow or other suitable soil turning equipment. Areas with significant staining, such as around the base of the compressor skid, will be excavated for off site disposal at a commercial land farm.

G. Pits, Ponds, or Lagoons

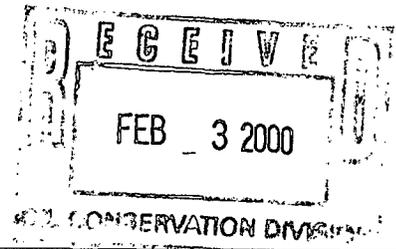
There are no pits or ponds at the site.

H. Chlorofluorocarbons

If any refrigeration equipment is to be removed, it will first have all freon evacuated for reuse in other similar equipment.

IV. GENERAL DEMOLITION DEBRIS

All non-degradable inert waste (rocks, concrete, scrap lumber, vegetation etc.) generated by the closure will be disposed of off site in either a commercial or municipal landfill.



February 1, 2000

Mr. Jack Ford
New Mexico Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505

Dear Jack:

As I indicated in my phone message to you last week, preparing a closure plan for the Burton Flats Plant during February will be quite difficult. This is due to the annual groundwater monitoring reports and the annual SARA Title III chemical inventory reports due this month. I would like to request an extension for filing of the closure plan, and submit it to your office on or before March 31, 2000.

If you need any additional information before March 31, please call me at (505) 599-2256.

Sincerely yours,

David Bays, REM
Principal Environmental Scientist

cc: Burton Flats Regulatory

*2-4-2000
Verbal Approval
for extension
WJF*



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

December 28, 1999

CERTIFIED MAIL
RETURN RECEIPT NO. Z-274-520-739

Mr. David Bays, REM
El Paso Energy Corporation
614 Reilly Avenue
Farmington, New Mexico 87401

**RE: Discharge Plan GW-013 Closure
Burton Flats Gas Plant
Eddy County, New Mexico**

Dear Mr. Bays:

The groundwater discharge plan, GW-013, for the El Paso Natural Gas Company Burton Flats Gas Plant located in the SE/4 SW/4 of Section 14, Township 20 South, Range 28 East, NMPM, Eddy County, New Mexico, expired on April 4, 1999. This discharge plan was required and submitted pursuant to Water Quality Control Commission (WQCC) regulations.

The New Mexico Oil Conservation Division (OCD) is in receipt of your letter, dated December 7, 1999, notifying the OCD that the subject facility has discontinued operations and will not re-start in the foreseeable future. **Based upon the information provided the OCD in your letter a renewal of the discharge plan, GW-013, will not be required. Please submit a closure plan by February 29, 2000 for OCD approval.**

If you have any questions, please do not hesitate to contact Mr. W. Jack Ford at (505) 827-7156.

Sincerely,

Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division

RCA/wjf

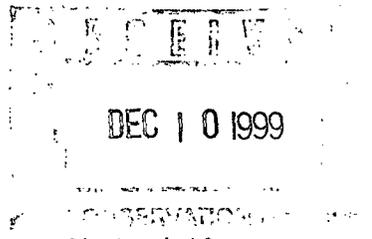
cc: OCD Artesia District Office

PS Form 3800, April 1995

Postmark or Date	
TOTAL Postage & Fees	\$
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
Restricted Delivery Fee	
Special Delivery Fee	
Certified Fee	
Postage	
Post Office, State, & ZIP Code	EL PASO
Street & Number	614 Reilly Avenue
Sent to	D. Bays

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

Z 274 520 739
FORD
OCD



December 7, 1999

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

**RE: Discharge Permit GW-013
Burton Flats Gas Plant
Eddy County, New Mexico**

Dear Sir:

Mr. Ross Hughes, Manager of the Carlsbad operating area, has informed me there is no likelihood that El Paso Natural Gas Co. will re-start the Burton Flats Gas Plant in the foreseeable future. Therefore El Paso has elected not to apply for renewal of Discharge Plan GW-013.

If you have any questions or need additional information, please call me at (505) 599-2256.

Sincerely yours,

A handwritten signature in cursive script that reads 'David Bays'.

David Bays, REM
Principal Environmental Scientist

cc: Mr. Ross Hughes
Burton Flats Reg. File

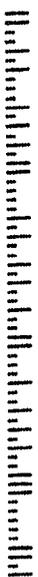


**EL PASO
FIELD SERVICES**

El Paso Field Services Company
614 Reilly Avenue
Farmington, New Mexico 87401

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

07505-8472 57





NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

September 16, 1999

CERTIFIED MAIL

RETURN RECEIPT NO. Z-274-520-536

Mr. Tom J. Martinez
El Paso Natural Gas Company
3300 North A Street, Building #2, Suite 200
Midland, Texas 79705

**RE: Discharge Plan GW-013 Renewal Notification
Burton Flats Gas Plant
Eddy County, New Mexico**

Dear Mr. Martinez:

On February 5, 1996, the groundwater discharge plan, GW-013, for the El Paso Natural Gas Company Burton Flats Gas Plant located in the SE/4 SW/4 of Section 14, Township 20 South, Range 28 East, NMPM, Eddy County, New Mexico, was approved by the Director of the New Mexico Oil Conservation Division (OCD) to be effective April 4, 1996. 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 expired on April 4, 1999.**

This facility is operating without a valid discharge plan. If the facility continues to have potential or actual effluent or leachate discharges and wishes to continue operation, the discharge plan must be renewed immediately. **Pursuant to Section 3106.F., if an application for renewal is submitted at least 120 days before the discharge plan expires, then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved. No renewal application has been received by the OCD to date.** The OCD is reviewing discharge plan submittals and renewals carefully and the review time can extend for several weeks to months. Please indicate whether El Paso Natural Gas Company has made or intends to make, any changes in the system, and if so, please include these modifications in the application for renewal.

The discharge plan renewal application for the **El Paso Natural Gas Company Burton Flats Gas Plant** is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of \$50.00 plus a flat fee equal to one-half of the original flat fee for gas plant facilities. The \$50.00 filing fee is to be submitted with the discharge plan renewal application and is nonrefundable.

Mr. Thomas Martinez
Burton Flats Gas Plant GW-013
September 16, 1999
Page 2

Please make all checks payable to **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office. Please submit the original discharge plan renewal application and one copy to the OCD Santa Fe Office and one copy to the OCD Artesia District Office. **Note that the completed and signed application form must be submitted with your discharge plan renewal request.** (A copy of the discharge plan application form is enclosed for your use. A complete copy of the regulations is also available on OCD's website at www.emnrd.state.nm.us/oed/).

If the El Paso Natural Gas Company Burton Flats Gas Plant no longer has any actual or potential discharges and a discharge plan is not needed, please notify this office. If El Paso Natural Gas Company. has any questions, please do not hesitate to contact me at (505) 827-7152.

Sincerely,



Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division

RCA/wjf

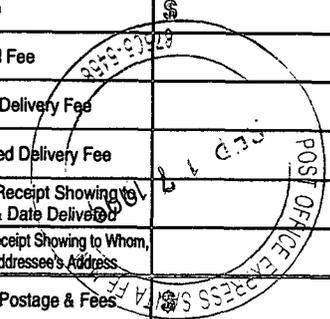
cc: OCD Artesia District Office

Z 274 520 536 *OCD*
Ford

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

Sent to	<i>T. Martinez</i>
Street & Number	<i>EPNG</i>
Post Office, State, & ZIP Code	<i>Midland</i>
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	
Postmark or Date	<i>AW-013</i>

PS Form 3800, April 1995





NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

September 26, 1996

CERTIFIED MAIL
RETURN RECEIPT NO. P - 288-258-639

Mr. Ricky D. Cosby
Compliance Specialist
El Paso Field Services (EPFS)
P.O. Box 4990
Farmington, NM 87499

RE: Molecular Sieve
GW-13, Burton Flats Plant
Eddy County, NM

Dear Mr. Cosby:

The New Mexico Oil Conservation Division (OCD) has received the EPFS letter dated September 23, 1996 requesting that the OCD allow EPFS to spread the RCRA Subtitle C Exempt Molecular Sieve onsite as road base. The OCD hereby approves of the spreading of this molecular sieve for the beneficial use as road base at the EPFS Burton Flats plant within the facility area.

- The molecular sieve will be dried out on liner as specified in the EPFS letter mentioned above.

Note, that OCD approval does not relieve EPFS of liability should EPFS operation's result in contamination of surface waters, ground waters or the environment. OCD approval does not relieve EPFS from compliance with other Federal, State, and Local Regulations/Rules that may apply.

Sincerely,

Patricio W. Sanchez,
Petroleum Engineering Specialist
Environmental Bureau

XC: Artesia District Office

PS Form 3800, April 1995

US Postal Service Receipt for Certified Mail No Insurance Coverage Provided. Do not use for International Mail (See reverse)	
Sent to	Cosby - EPFS
Street & Number	GW-13, Mole Sieve.
Post Office, State, & ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

P 288 258 639

EPFS

EL PASO FIELD SERVICES

RECEIVED
OIL CONSERVATION DIVISION
SEP 25 1996

P.O. Box 4990
Farmington N.M. 87499

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

Date: September 23, 1996

Mr. Sanchez,

El Paso Field Services is planning to perform an annual inspection of a dehydrator located at the Burton Flats facility in SW/4 SW/4 Sec. 14, T20S, R24E. At this time the molecular sieves from the dehydrator to be replaced. EPFS requests to use this RCRA exempt material as road base within the facility area. The removed sieves will be placed on a liner in the event that any moisture is retained until the moisture is evaporated. Depth to groundwater is greater than 35 ft. Please find attached a Material Safety Data Sheet for molecular sieves.

Sincerely,



Ricky D. Cosby
Compliance Specialist

RECEIVED

SEP 25 1996

Environmental Bureau
Oil Conservation Division

entire 2134

J.T.BAKER INC. 222 RED SCHOOL LANE, PHILLIPSBURG, NJ 08865
MATERIAL SAFETY DATA SHEET
24-HOUR EMERGENCY TELEPHONE -- (201) 859-2151
CHEMTREC # (800) 424-9300 -- NATIONAL RESPONSE CENTER # (800) 424-8802

M7775 D03
EFFECTIVE: 05/01/89

MOLECULAR SIEVE, ACTIVATED

PAGE: 1
ISSUED: 05/16/89

J.T.BAKER INC., 222 RED SCHOOL LANE, PHILLIPSBURG, NJ 08865

SECTION I - PRODUCT IDENTIFICATION

PRODUCT NAME: MOLECULAR SIEVE, ACTIVATED
COMMON SYNONYMS: SYNTHETIC ZEOLITE; SODIUM CALCIUM SILICOALUMINATE
CHEMICAL FAMILY: SILICON COMPOUNDS
FORMULA: N/A
FORMULA WT.: N/A
CAS NO.: N/A
NIOSH/RTECS NO.: N/A
PRODUCT USE: LABORATORY REAGENT
PRODUCT CODES: 2710,2709,2708

PRECAUTIONARY LABELING

BAKER SAF-T-DATA* SYSTEM

HEALTH	-	0	NONE
FLAMMABILITY	-	0	NONE
REACTIVITY	-	0	NONE
CONTACT	-	1	SLIGHT

RECEIVED

LABORATORY PROTECTIVE EQUIPMENT

GOGGLES; LAB COAT

SEP 25 1996

Environmental Bureau
Oil Conservation Division

U.S. PRECAUTIONARY LABELING

CAUTION

MAY CAUSE IRRITATION.
DURING USE AVOID CONTACT WITH EYES, SKIN, CLOTHING. WASH THOROUGHLY AFTER HANDLING. WHEN NOT IN USE KEEP IN TIGHTLY CLOSED CONTAINER.

INTERNATIONAL LABELING

AVOID CONTACT WITH EYES. AFTER CONTACT WITH SKIN, WASH IMMEDIATELY WITH PLENTY OF WATER. KEEP CONTAINER TIGHTLY CLOSED.

SAF-T-DATA* STORAGE COLOR CODE: ORANGE (GENERAL STORAGE)

CONTINUED ON PAGE: 2

H7779 D03 MOLECULAR SIEVE, ACTIVATED
EFFECTIVE: 05/01/89

PAGE: 3
ISSUED: 05/16/89

SECTION IV - FIRE AND EXPLOSION HAZARD DATA (CONTINUED)

UNUSUAL FIRE & EXPLOSION HAZARDS

CONTACT WITH MOISTURE OR WATER MAY GENERATE SUFFICIENT HEAT TO IGNITE COMBUSTIBLE MATERIALS.

TOXIC GASES PRODUCED
NONE IDENTIFIED

EXPLOSION DATA-SENSITIVITY TO MECHANICAL IMPACT
NONE IDENTIFIED.

EXPLOSION DATA-SENSITIVITY TO STATIC DISCHARGE
NONE IDENTIFIED.

SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE (TLV/TWA): NOT ESTABLISHED

SHORT-TERM EXPOSURE LIMIT (STEL): NOT ESTABLISHED

PERMISSIBLE EXPOSURE LIMIT (PEL): NOT ESTABLISHED

TOXICITY OF COMPONENTS

NO INFORMATION IS AVAILABLE

CARCINOGENICITY: NTP: NO IARC: NO Z LIST: NO OSHA REG: NO

CARCINOGENICITY
NONE IDENTIFIED.

REPRODUCTIVE EFFECTS
NONE IDENTIFIED.

EFFECTS OF OVEREXPOSURE

INHALATION: IRRITATION OF UPPER RESPIRATORY TRACT

SKIN CONTACT: IRRITATION

EYE CONTACT: IRRITATION

CONTINUED ON PAGE: 4

J.T. BAKER INC. 222 RED SCHOOL LANE, PHILLIPSBURG, NJ 08865
M A T E R I A L S A F E T Y D A T A S H E E T
24-HOUR EMERGENCY TELEPHONE -- (201) 859-2151
CHEMTREC # (800) 424-9300 -- NATIONAL RESPONSE CENTER # (800) 424-8802

M7775 D03 MOLECULAR SIEVE, ACTIVATED
EFFECTIVE: 05/01/89

PAGE: 4
ISSUED: 05/16/89

=====

SECTION V - HEALTH HAZARD DATA (CONTINUED)

=====

SKIN ABSORPTION: NONE IDENTIFIED

INGESTION: NONE IDENTIFIED

CHRONIC EFFECTS: NONE IDENTIFIED

TARGET ORGANS
EYES, SKIN

MEDICAL CONDITIONS GENERALLY AGGRAVATED BY EXPOSURE
NONE IDENTIFIED

PRIMARY ROUTES OF ENTRY
EYE CONTACT, SKIN CONTACT, INHALATION

EMERGENCY AND FIRST AID PROCEDURES

INGESTION: IF SWALLOWED AND THE PERSON IS CONSCIOUS, IMMEDIATELY GIVE
LARGE AMOUNTS OF WATER. GET MEDICAL ATTENTION.

INHALATION: IF A PERSON BREATHES IN LARGE AMOUNTS, MOVE THE EXPOSED
PERSON TO FRESH AIR.

SKIN CONTACT: IN CASE OF CONTACT, IMMEDIATELY WASH SKIN WITH PLENTY OF
SOAP AND WATER FOR AT LEAST 15 MINUTES.

EYE CONTACT: IN CASE OF EYE CONTACT, IMMEDIATELY FLUSH WITH PLENTY OF
WATER FOR AT LEAST 15 MINUTES.

SARA/TITLE III HAZARD CATEGORIES AND LISTS

ACUTE: YES CHRONIC: YES FLAMMABILITY: NO PRESSURE: NO REACTIVITY: NO

EXTREMELY HAZARDOUS SUBSTANCE: NO
CERCLA HAZARDOUS SUBSTANCE: NO
TOXIC CHEMICALS: NO
TSCA INVENTORY: YES

CONTINUED ON PAGE: 5

M7775 003

MOLECULAR SIEVE, ACTIVATED

PAGE: 5

EFFECTIVE: 05/01/89

ISSUED: 05/16/89

SECTION VI - REACTIVITY DATA

STABILITY: STABLE

HAZARDOUS POLYMERIZATION: WILL NOT OCCUR

CONDITIONS TO AVOID: NO DISTURBANCE

INCOMPATIBLES: HYDROGEN FLUORIDE, STRONG ACIDS, ALKALIES, OLEFINS,
WATER

DECOMPOSITION PRODUCTS: NONE IDENTIFIED

SECTION VII - SPILL & DISPOSAL PROCEDURES

STEPS TO BE TAKEN IN THE EVENT OF A SPILL OR DISCHARGE
WEAR SUITABLE PROTECTIVE CLOTHING. CAREFULLY SWEEP UP AND REMOVE.

DISPOSAL PROCEDURE

DISPOSE IN ACCORDANCE WITH ALL APPLICABLE FEDERAL, STATE, AND LOCAL
ENVIRONMENTAL REGULATIONS.

SECTION VIII - INDUSTRIAL PROTECTIVE EQUIPMENT

VENTILATION: USE ADEQUATE GENERAL OR LOCAL EXHAUST VENTILATION TO
KEEP FUME OR 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 GOGGLES, PROPER GLOVES ARE RECOMMENDED.

SECTION IX - STORAGE AND HANDLING PRECAUTIONS

SAF-T-DATA* STORAGE COLOR CODE: ORANGE (GENERAL STORAGE)

STORAGE REQUIREMENTS

KEEP CONTAINER TIGHTLY CLOSED. SUITABLE FOR ANY GENERAL CHEMICAL STORAGE
AREA.

CONTINUED ON PAGE: 6

M7775 D03
EFFECTIVE: 05/01/89

MOLECULAR SIEVE, ACTIVATED

PAGE: 6
ISSUED: 05/16/89

=====

SECTION X - TRANSPORTATION DATA AND ADDITIONAL INFORMATION

=====

DOMESTIC (D.O.T.)

PROPER SHIPPING NAME: CHEMICALS, N.O.S. (NON-REGULATED)

INTERNATIONAL (I.M.O.)

PROPER SHIPPING NAME: CHEMICALS, N.O.S. (NON-REGULATED)
MARINE POLLUTANTS: NO

AIR (I.C.A.O.)

PROPER SHIPPING NAME: CHEMICALS, N.O.S. (NON-REGULATED)

U.S. CUSTOMS HARMONIZATION NUMBER: 38239060007

=====

N/A = NOT APPLICABLE OR NOT AVAILABLE
N/E = NOT ESTABLISHED

THE INFORMATION IN THIS MATERIAL SAFETY DATA SHEET MEETS THE REQUIREMENTS OF THE UNITED STATES OCCUPATIONAL SAFETY AND HEALTH ACT AND REGULATIONS PROMULGATED THEREUNDER (29 CFR 1910.1200 ET. SEQ.) AND THE CANADIAN WORKPLACE HAZARDOUS MATERIALS INFORMATION SYSTEM. THIS DOCUMENT IS INTENDED ONLY AS A GUIDE TO THE APPROPRIATE PRECAUTIONARY HANDLING OF THE MATERIAL BY A PERSON TRAINED IN, OR SUPERVISED BY A PERSON TRAINED IN, CHEMICAL HANDLING. THE USER IS RESPONSIBLE FOR DETERMINING THE PRECAUTIONS AND DANGERS OF THIS CHEMICAL FOR HIS OR HER PARTICULAR APPLICATION. DEPENDING ON USAGE, PROTECTIVE CLOTHING INCLUDING EYE AND FACE GUARDS AND RESPIRATORS MUST BE USED TO AVOID CONTACT WITH MATERIAL OR BREATHING CHEMICAL VAPORS/FUMES.

EXPOSURE TO THIS PRODUCT MAY HAVE SERIOUS ADVERSE HEALTH EFFECTS. THIS CHEMICAL MAY INTERACT WITH OTHER SUBSTANCES. SINCE THE POTENTIAL USES ARE SO VARIED, BAKER CANNOT WARN OF ALL OF THE POTENTIAL DANGERS OF USE OR INTERACTION WITH OTHER CHEMICALS OR MATERIALS. BAKER WARRANTS THAT THE CHEMICAL MEETS THE SPECIFICATIONS SET FORTH ON THE LABEL. BAKER DISCLAIMS ANY OTHER WARRANTIES, EXPRESSED OR IMPLIED WITH REGARD TO THE PRODUCT SUPPLIED HEREUNDER, ITS MERCHANTABILITY OR ITS FITNESS FOR A PARTICULAR PURPOSE.

THE USER SHOULD RECOGNIZE THAT THIS PRODUCT CAN CAUSE SEVERE INJURY AND EVEN DEATH, ESPECIALLY IF IMPROPERLY HANDLED OR THE KNOWN DANGERS OF USE ARE NOT HEEDED. READ ALL PRECAUTIONARY INFORMATION. AS NEW DOCUMENTED GENERAL SAFETY INFORMATION BECOMES AVAILABLE, BAKER WILL PERIODICALLY REVISE THIS MATERIAL SAFETY DATA SHEET. IF YOU HAVE ANY QUESTIONS,

CONTINUED ON PAGE: 7

J.T.BAKER INC. 222 RED SCHOOL LANE, PHILLIPSBURG, NJ 08865
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24-HOUR EMERGENCY TELEPHONE -- (201) 859-2151
CHEMTREC # (800) 424-9300 -- NATIONAL RESPONSE CENTER # (800) 424-8802

M7775 003
EFFECTIVE: 05/01/89

MOLECULAR SIEVE, ACTIVATED

PAGE: 7
ISSUED: 05/16/89

=====

PLEASE CALL CUSTOMER SERVICE (1-800-JTBAKER) FOR ASSISTANCE.

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APPROVED BY QUALITY ASSURANCE DEPARTMENT.

-- LAST PAGE --

EPFS
EL PASO FIELD SERVICES

OIL CONSERVATION DIVISION
RECEIVED

1996 FEB 26 10 08 52

February 23, 1996

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

RECEIVED

FEB 26 1996

Environmental Bureau
Oil Conservation Division

RE: Discharge Plan ~~GW-13~~ and GW-232 Special Conditions

In accordance with Mr. William LeMay's letter of February 5, 1996, I have signed the Special Conditions for the above reference Discharge Plans. Your original set of Special Conditions for each facility is attached.

Sincerely yours,



David Bays, REM
Sr. Environmental Scientist

cc: S. D. Miller/P. J. Marquez

RECEIVED

FEB 26 1996

Mr. David Bays
February 5, 1996
Page 3

Environmental Bureau
Oil Conservation Division

**Attachment to the Discharge Plan GW-013 Approval
Burton Flats Gas Plant
Discharge Requirements
February 5, 1996**

1. **Drum Storage:** All chemical and lubrication drums shall be stored on pad and curb type containment.
2. **Sump Integrity Test Methods:** All existing sumps shall be visually inspected at least monthly for leaks and/or fluids within the secondary containment. Reports of inspections shall be maintained at the gas plant for a minimum of five years. Primary containment failures resulting in leaks to the secondary containment shall be reported and remediated according to OCD Rule 116.

Any new sumps or below-grade tanks will incorporate leak detection in their designs.

3. **Pressure Testing:** Positive pressure testing of the plant drain system shall be performed according to the procedures outlined in the attachment to the response to OCD comments dated February 16, 1994.
4. **Spills:** All spills and /or leaks shall be reported to the OCD district office pursuant to WQCC 1203 and OCD Rule 116.

5. David Bay Feb. 23, 1996
Company Representative Date
Sr. Environmental Scientist
Title

RECEIVED

DEC 22 1995

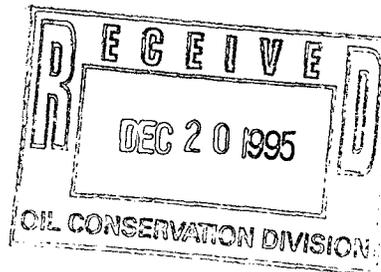
Environmental Bureau
Oil Conservation Division

P. O. Box 4990
FARMINGTON, NEW MEXICO 87499

EPFS
EL PASO FIELD SERVICES

December 18, 1995

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



**RE: Discharge Plan GW-13
Burton Flats Gasoline Plant
Eddy County, New Mexico**

Dear Mr. Sanchez:

El Paso Field Services Co. (EPFS) has purchased the Burton Flats Gasoline Plant from Amoco Production Company. The Discharge Plan for the facility has been transferred to EPFS by Amoco Production Co.

According to the Discharge Plan approval letter, issued by NMOCD on April 4, 1994, the Plan expires on February 20, 1999. EPFS will submit an application for renewal of the Plan prior to that date.

There have been no modifications to the facility since the Discharge Plan was renewed. Contact names for the facility are:

Legally Responsible Party: Hugh A. Shaffer
Vice President, Operations and Engineering
El Paso Field Services Company
100 N. Stanton
El Paso, TX 79901
(915) 541-5200

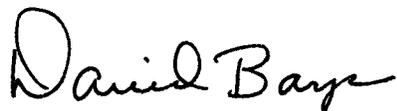
Local Representative: Sandra Miller
Superintendent, Environmental Compliance
El Paso Field Services Company
614 Reilly Ave.
Farmington New Mexico 87401
(505) 599-2141 24 hour - (505) 325-2841

Plant Operator: El Paso Field Services Company
3008 E. Green
Carlsbad, New Mexico 88220
(505) 885-4751

Mr. Pat Sanchez
December 18, 1995
Page 2

If you need any additional information, please call me at (505) 599-2256.

Sincerely yours,

A handwritten signature in cursive script that reads "David Bays". The signature is written in black ink and is positioned below the "Sincerely yours," text.

David Bays, REM
Sr. Environmental Scientist

cc: Mr. Ray Smith - NMOCD - Artesia
J. C. Bishop
S. D. Miller/Burton Flats file

MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone <input type="checkbox"/> Personal	Time 10:30 AM	Date 12-13-95
<u>Originating Party</u>	<u>Other Parties</u>	
David Bays - EPNG (Returned my earlier call)	Pat Sanchez - OCD	
<u>Subject</u> Burton Flats GW-13 - Sale by Amoco to EPNG		

Discussion

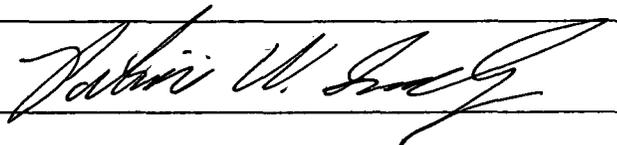
(1) OCD needs a letter from EPNG accepting the terms of the discharge Plan. - also if only utilizing as a compressor and chance of Cryogenic Unit being started up - may want to renew as a compressor station & not a Gas Plant.

(2) Mr. Bays will handle (1) above - he does not have a copy of the Plan - he will follow up internally and possibly have to get a copy from OCD - I mentioned that he could set up an account at Kinkos and we could take the file to have a copy made.

Mr. Bays will submit a letter accepting the terms, conditions, of the discharge plan.

Distribution File.

Signed





OIL CONSERVATION DIVISION

RECEIVED Amoco Exploration And Production

'95 DE 1 8

U.S. NGL Business Unit
501 Westlake Park Boulevard
Post Office Box 3092
Houston, Texas 77253-3092

RECEIVED

DEC 1 1 1995

Environmental Bureau
Oil Conservation Division

December 4, 1995

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

Re: Burton Flats Gas Plant Discharge Plan GW-13, Eddy County, New Mexico

GW-013

Dear Mr. Anderson,

Amoco Production Company closed the sale of the subject facility to El Paso Natural Gas Company in September, 1995. Amoco has made El Paso aware of the existence of the plan and provided a copy thereof to El Paso. Please remove Amoco Production Company as the operator for this plan.

Please feel free to contact Mike McKinley at (713) 366-3907 if you need further information on this matter.

Sincerely,

H. A. Partlow
Manager, Environment, Health & Safety Services

c: Mr. D. Mark Leland
El Paso Natural Gas Company
P. O. Box 1492
El Paso, Texas 79978
Tom Krisa - No Cowden Gas Plant
Ronnie Tuttle - Empire Abo Gas Plant

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

July 13, 1995

Z 765 962 373

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-962-373



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Mr. G.D. Henry
 Amoco Production Company
 P.O. Box 3092
 Houston, Texas 77253-3092

Sent to	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	

RE: **EVAPORATION PIT CLOSURE REPORT**
AMOCO BURTON FLATS GAS PLANT
EDDY COUNTY, NEW MEXICO

Dear Mr. Henry:

The New Mexico Oil Conservation Division (OCD) has completed a review of Amoco's May 17, 1995 "EVAPORATION PIT, BURTON FLATS GAS PLANT" which documents the final closure actions for a former lined pit at the Burton Flats Gas Plant.

The above referenced final closure report is approved.

Please be advised that OCD approval does not relieve Amoco of liability if remaining contaminants are found to pose a future threat to surface water, ground water, human health or the environment. In addition, OCD approval does not relieve Amoco of responsibility for compliance with any other federal, state or local laws and/or regulations.

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

Sincerely,

William C. Olson
 Hydrogeologist
 Environmental Bureau

xc: OCD Artesia Office



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

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

April 14, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. P-667-242-242

Mr. G.D. Henry
Amoco Production Company
P.O. Box 3092
Houston, Texas 77253-3092

**RE: EVAPORATION PIT
AMOCO BURTON FLATS GAS PLANT
EDDY COUNTY, NEW MEXICO**

Dear Mr. Henry:

The New Mexico Oil Conservation Division (OCD) has completed a review of Amoco's March 30, 1994 "EVAPORATION PIT, BURTON FLATS GAS PLANT". This document contains the results of the investigation of the extent of contamination from a former lined pit at the Burton Flats Gas Plant. This document also contains Amoco's proposal for closure of the pit.

The investigation actions are satisfactory and the proposed closure plan for the above referenced pit is approved with the following conditions:

1. Amoco will submit a final report on the closure of the pit by July 1, 1995.
2. Amoco will submit all original documents to the OCD Santa Fe Office with copies provided to the OCD Artesia Office.

Please be advised that OCD approval does not relieve Amoco of liability if, in the future, remaining contaminants are found to pose a threat to surface water, ground water, human health or the environment. In addition OCD approval does not relieve Amoco of responsibility for compliance with any other federal, state or local laws and/or regulations.

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

Sincerely,

William C. Olson
Hydrogeologist
Environmental Bureau

xc: OCD Artesia Office

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P.O., State & ZIP Code	
Postage	\$
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Bill Olson

From: Bill Olson
To: Tim Gumm
Cc: Ray Smith
Subject: Amoco Burton Flats
Date: Wednesday, April 12, 1995 9:35AM
Priority: High

Attached is a draft approval letter for Amoco's proposed closure of a pit at the Burton Flats Gas Plant. Please provide me with any comments by 9:30 am on 4/14/95. Thanks!

<<File Attachment: REMEDY3.APR>>

Bill Olson

From: Tim Gumm
Date sent: Wednesday, April 12, 1995 9:45AM
To: Bill Olson
Subject: Registered: Tim Gumm

Your message

To: Tim Gumm
Subject: Amoco Burton Flats
Date: Wednesday, April 12, 1995 9:35AM
was accessed on
Date: Wednesday, April 12, 1995 9:45AM

Bill Olson

From: Ray Smith
Date sent: Wednesday, April 12, 1995 11:58AM
To: Bill Olson
Subject: Registered: Ray Smith

Your message

To: Ray Smith
Subject: Amoco Burton Flats
Date: Wednesday, April 12, 1995 9:35AM
was accessed on
Date: Wednesday, April 12, 1995 11:58AM

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING
GOVERNOR

September 21, 1994

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

ANITA LOCKWOOD
CABINET SECRETARY

CERTIFIED MAIL
RETURN RECEIPT NO. P-111-334-173

Mr. G.D. Henry
Amoco Production Company
South Permian Basin Business Unit
P.O. Box 3092
Houston, Texas 77253-3092

**RE: ENVIRONMENTAL ASSESSMENT AND REMEDIAL ACTIONS
AMOCO BURTON FLATS GASOLINE PLANT
EDDY COUNTY, NEW MEXICO**

Dear Mr. Henry:

The New Mexico Oil Conservation Division (OCD) has completed a review of Amoco's July 24, 1994 correspondence and June 23, 1994 "BURTON FLATS GAS PLANT SOIL AND GROUNDWATER EVALUATIONS". These documents contain information on investigation and remedial actions related to Amoco's April 14, 1994 Phase II Environmental Assessment which was conducted at the Burton Flats Gasoline Plant in Eddy County, New Mexico. These documents also contain Amoco's proposal to temporarily bioremediate contaminated soils generated during the remedial actions at a centralized location on the facility.

The investigation and source remedial actions are approved as meeting the standards in effect at the time the actions were conducted. In addition, the proposal for temporary onsite bioremediation of contaminated soils, as contained in the above referenced documents, is approved with the following conditions:

1. Amoco will submit for approval, prior to application, the application rates and composition of any moisture or nutrients to be used to enhance bioremediation of the soils.
2. Amoco will provide a report on the onsite bioremediation activities upon completion of the project. The report will include the volume of contaminated soils excavated from each source area for on-site bio-remediation, a description of all activities and the results of all associated sampling.

Mr. G.D. Henry
September 21, 1994
Page 2

3. Amoco will submit all original documents to the OCD Santa Fe Office with copies provided to the OCD Artesia Office.

Please be advised that OCD approval does not relieve Amoco of liability if, in the future, remaining contaminants are found to pose a threat to surface water, ground water, human health or the environment. In addition OCD approval does not relieve Amoco of responsibility for compliance with any other federal, state or local laws and/or regulations.

If you have any questions, please contact me at (505) 827-5885.

Sincerely,



William C. Olson
Hydrogeologist
Environmental Bureau

xc: OCD Artesia Office

P 111 334 173



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PS Form 3800, June 1991

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STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING
GOVERNOR

September 16, 1994

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SANTA FE, NEW MEXICO 87504
(505) 827-5800

ANITA LOCKWOOD
CABINET SECRETARY

CERTIFIED MAIL
RETURN RECEIPT NO. P-111-334-170

Mr. G.D. Henry
Amoco Production Company
South Permian Basin Business Unit
P.O. Box 3092
Houston, Texas 77253-3092

**RE: PHASE II ENVIRONMENTAL ASSESSMENT AND REMEDIATION
AMOCO BURTON FLATS GASOLINE PLANT**

Dear Mr. Henry:

The New Mexico Oil Conservation Division (OCD) has completed a review of Amoco's June 23, 1994 "BURTON FLATS GAS PLANT SOIL AND GROUNDWATER EVALUATIONS". This document contains additional investigation and remedial action information related to Amoco's April 14, 1994 Phase II Environmental Assessment which was conducted at the Burton Flats Gasoline Plant in Eddy County, New Mexico.

The investigation and source remedial actions appear satisfactory. However, in order for the OCD to complete a review of the above referenced documents, the OCD requests that Amoco provide the following information:

1. Please provide a map showing the location of contaminated soils which are being bio-remediated on-site or provide the disposal location if the soils were removed for offsite disposal.
2. Please provide the volume of contaminated soils excavated from each source area for on-site bio-remediation.
3. Please provide information of the methods used for on-site bio-remediation of these contaminated soils.

If you have any questions, please contact me at (505) 827-5885.

Sincerely,

William C. Olson
Hydrogeologist
Environmental Bureau

xc: OCD Artesia Office

P 111 334 170

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OIL CONSERVATION DIVISION
 DISTRICT I
 P.O. Box 1890, Hobbs, NM 88241-1980

94 DISTRICT II
 P.O. Box 1179, Artesia, NM 88211-0719

DISTRICT III
 1000 Rio Brazos Rd, Aztec, NM 87410

State of New Mexico
 Energy, Minerals and Natural Resources Department
 RECEIVED

OIL CONSERVATION DIVISION

P.O. Box 2088
 Santa Fe, New Mexico 87504-2088 JUN - 7 '94

Bill Olson

SUBMIT 2 COPIES TO
 APPROPRIATE DISTRICT
 OFFICE IN ACCORDANCE
 WITH RULE 116 PRINTED
 ON BACK SIDE OF FORM

SF

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

OPERATOR Amoco Production Company						ADDRESS P. O. Box 3092, Houston, TX 77253		TELEPHONE # 713-366-7362
REPORT OF	FIRE	BREAK	SPILL X	LEAK	BLOWOUT	OTHER*		
TYPE OF FACILITY	DRLG WELL	PROD WELL	TANK BTRY	PIPE LINE	GASO PLNT X	OIL RFY	OTHER*	

FACILITY NAME: Burton Flats Gas Plant

LOCATION OF FACILITY
 Qtr/Qtr Sec. or Footage SE/4 SW/4 SEC. 14 TWP. 20-S RGE. 28-E COUNTY Eddy

DISTANCE AND DIRECTION FROM NEAREST TOWN OR PROMINENT LANDMARK 12 miles Northeast of Carlsbad, NM

DATE AND HOUR OF OCCURRENCE May 29, 1994, 9:00 a.m. DATE AND HOUR OF DISCOVERY May 29, 1994, 9:00 a.m.

WAS IMMEDIATE NOTICE GIVEN? YES NO NOT REQUIRED X

BY WHOM DATE AND HOUR

TYPE OF FLUID LOST Crude oil and saltwater QUANTITY OF LOSS 7 bbls. 5 bbls. COVERED 5 bbls. 3 bbls.

DID ANY FLUIDS REACH A WATERCOURSE? YES NO X QUANTITY

IF YES, DESCRIBE FULLY**

DESCRIBE CAUSE OF PROBLEM AND REMEDIAL ACTION TAKEN**

Separator operated by Oxy NGL, Inc. failed causing fluid to go down gas line to plant. Slop oil tank overflowed and out of secondary containment. Vacuum truck picked up fluid.

DESCRIBE AREA AFFECTED AND CLEANUP ACTION TAKEN**

Fresh dirt mixed into affected area with a backhoe.

DESCRIPTION OF AREA	FARMING	GRAZING	URBAN	OTHER*	Caliche Pad
SURFACE CONDITIONS	SANDY	SANDY LOAM	CLAY X	ROCKY	WET DRY X SNOW

DESCRIBE GENERAL CONDITIONS PREVAILING (TEMPERATURE, PRECIPITATION, ETC.)**

Clear, 80°

I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF

SIGNED *Karl McGinnis* PRINTED NAME Karl McGinnis AND TITLE Staff Business Analyst DATE 6/1/94

*SPECIFY **ATTACH ADDITIONAL SHEETS IF NECESSARY

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

May 20, 1994

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87504
(505) 827-5800ANITA LOCKWOOD
CABINET SECRETARY**CERTIFIED MAIL**
RETURN RECEIPT NO. P-111-334-112

Mr. G.D. Henry
Amoco Production Company
South Permian Basin Business Unit
P.O. Box 3092
Houston, Texas 77253-3092

**RE: PHASE II ENVIRONMENTAL ASSESSMENT
AMOCO BURTON FLATS GASOLINE PLANT**



Sent to
Street and No.

Dear Mr. Henry:

The New Mexico Oil Conservation Division (OCD) is in receipt of Amoco's April 14, 1994 correspondence transmitting the results of the Phase II Environmental Assessment which was conducted at the Burton Flats Gasoline Plant in Eddy County, New Mexico.

Upon a review of this document, the OCD has the following comments and requests regarding the above referenced document:

1. High levels of petroleum contaminants were present in the soils at the lowermost interval sampled around the vent stack, slop oil tank and in the process area. Because these contaminants are in excess of OCD's recommended contaminant levels (enclosed), the OCD requires that Amoco submit, by August 1, 1994, a work plan to determine the vertical extent of contamination in these areas.
2. Please provide a map showing the locations of all monitor wells and the direction of the hydraulic gradient.
3. Please provide a well construction schematic which shows how the monitor wells were completed and illustrates the water table elevation in relation to the ground surface and well screen.

If you have any questions, please contact me at (505) 827-5885.

Sincerely,

William C. Olson
Hydrogeologist
Environmental Bureau

xc: OCD Artesia Office



OIL CONSERVATION DIVISION
RECEIVED

'94 MAR 3 AM 8 39

Amoco Production Company

South Permian Basin
Business Unit
501 WestLake Park Boulevard
Post Office Box 3092
Houston, Texas 77253-3092

G. D. Henry
Manager, Environment,
Health and Safety

February 25 , 1994

State of New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
P. O. Box 2088
State Land Office Building
Santa Fe, New Mexico 87504

Attention: Mr. Robert L. Myers II
Petroleum Engineer Specialist

File: GDH-2171-988.GW00

Pit Closure Request
Burton Flats Gasoline Plant
Eddy County, New Mexico

The purpose of this letter is to advise of the analysis results from the sampling of the Burton Flats Gasoline Plant's overflow/evaporation pit as per the pit closure procedure described in our letter of January 31, 1994, File: GDH-2152-988.GW00.

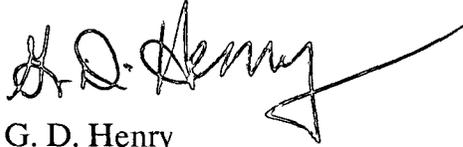
The sample analysis results are 1,528 ppm of TRPHC and a very low amount of BTEX (copy attached). Based on these results Amoco will transport the pit liquids to the Myrtle Myer SWD, OCD:Order SWD-391, and remediate the remaining solids onsite. The solids will be mixed with existing native soil in the northwest corner of the plant (north of the pit) and spread to a depth of 12 inches or less for natural hydrocarbon degradation.

If you concur with our proposal we request approval to proceed with our closure plan. By copy of this letter to the BLM along with a copy of the closure plan we are also requesting their approval.



Please contact Karl McGinnis at (713) 366-7362 if additional information is required.

Sincerely,

A handwritten signature in black ink, appearing to read "G. D. Henry", with a long, sweeping horizontal stroke extending to the right.

G. D. Henry

KLM/jsl
Attachment

cc: NMOCD District II, 811 South First Street,
P. O. Drawer DD, Artesia, NM 88210

U. S. Department of the Interior, Bureau of Land Management
Roswell District Office Attn: Kate Cebrowski
1717 West Second Street, Roswell, New Mexico 88210



PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603
 PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240
 PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

FINAL ANALYSIS REPORT

Company: Amoco Production Co.
 Address: P.O. Box 3092
 City, State: Houston, TX 77253

Date: 2/18/94
 Lab#: H1536

Project Name:
 Project Location: Burton Flats Gas Plant
 Sampled by: CC Date: 2/17/94 Time: not supplied
 Analyzed by: HM Date: 2/18/94 Time: 1:00
 Type of Samples: aqueous Sample Condition: GIST Units: mg/l

Samp #	Field Code	TRPHC	BENZENE	TOLUENE	ETHYL BENZENE	PARA-XYLENE	META-XYLENE	ORTHO-XYLENE
1	BFGP	1,528	<0.001	0.011	<0.001	<0.001	0.005	<0.001

QC Recovery	41.0	0.876	0.840	0.848	0.828	0.813	0.847
QC Spike	40.6	0.881	0.867	0.874	0.877	0.869	0.893
Accuracy	101.0%	99.4%	96.9%	97.0%	94.4%	93.6%	94.8%
Air Blank	***	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001

Methods - AUTOMATED HEADSPACE GC; INFRARED SPECTROSCOPY
 - EPA SW-846; EPA METHODS 8020, 418.1, 3540 OR 3510

Hope Moreno
 Hope Moreno

Date 02-18-94

BURTON FLATS GAS PLANT PIT CLOSURE

The South Permian Basin Business Unit (SPBBU) of Amoco Production Company requests approval to close an overflow/evaporation pit at its Burton Flats Gas Plant. Background data and closure plans are addressed below.

Background Data

The SPBBU purchased the Burton Flats Gas Plant from Trident NGL, Inc. in December, 1992. It is located in Section 14, R-28-E, T-20-S, Eddy County, New Mexico. The plant has one overflow/evaporation pit located in the northeast corner of the plant. Pit measurements are 64' X 64' X 18'. The pit is lined, netted and contained at one time or another produced water, rain water, sediment oil, and miscellaneous hydrocarbons. It is our understanding that a new liner was installed in 1987. Prior to the purchase of the plant, the SPBBU conducted a Phase II environmental assessment which included the drilling of three ground water monitoring wells. One of the monitoring wells was drilled approximately 36 feet down gradient from the southwest corner of the pit. Fluid level as measured in December 1993 was 36.30 feet. BTEX sample analysis showed non detect. The pit has been disconnected from all lines and currently is holding approximately one foot of sludge material.

Pit Closure Procedure

- 1) Conduct random, composite sampling of sludge material in pit. Test for TPH and BTEX.
- 2) Proper disposal or remediation of pit sludge based on lab analysis with BLM and NMOCD approval.
- 3) Inspect pit liner for leaks. If no leaks are found, roll liner into pit and backfill with pit surface material and native soil. If leaks are found in the liner, remove liner from that section(s) and remediate or dispose of contaminates per BLM and NMOCD requirements. Roll liner into pit and backfill with pit surface material and native soil.
- 4) Contour pit surface area to surrounding land. Excess fill material will be stockpiled onsite and utilized for future settling of the pit surface area.
- 5) Reseed pit area for local vegetation.
- 6) Documentation of all work associated with the pit closure including copies of sample analyses and a plat showing location of pit and sample coordinates will be filed onsite at the plant for historical reference.



CONSERVATION DIVISION
RECEIVED

1994 FEB 23 AM 8 30

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
Ecological Services

Suite D, 3530 Pan American Highway, NE
Albuquerque, New Mexico 87107

February 23, 1994

Permit# GW94018

Mr. William J. Lemay
Director, State of New Mexico
Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504-2088

Dear Mr. Lemay:

This responds to the notice of publication received by the U.S. Fish and Wildlife Service (Service) on February 1, 1994, regarding the Oil Conservation Division (OCD) discharge plan application submitted by Amaco Production Company.

GW-13 - Amaco Production Company, Houston, TX, submitted an application for renewal of its previously approved discharge plan for the Burton Flats Gas Processing Plant located in the SE/4, SW/4, section 14, Township 20 South, Range 28 East, Eddy County, New Mexico. The wastewater will be collected in on-site storage tanks and disposed of in a UIC-permitted Class II disposal well.

The Service has determined there will be no effects on fish, shellfish, and wildlife resources in New Mexico.

If you have any questions concerning our comments, please contact Mary Orms at (505) 883-7877.

Sincerely,

R. Mark Wilson

For/ Jennifer Fowler-Propst
State Supervisor

cc:

Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico
Regional Administrator, U.S. Environmental Protection Agency, Dallas, Texas



OIL CONSERVATION DIVISION
RECEIVED

FEB 16 1994 8 35

Amoco Production Company

South Permian Basin
Business Unit
501 WestLake Park Boulevard
Post Office Box 3092
Houston, Texas 77253-3092

G. D. Henry
Manager, Environment,
Health and Safety

February 16, 1994

CERTIFIED MAIL
RETURN RECEIPT NO. P 387 142 116

State of New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
P. O. Box 2088
State Land Office Building
Santa Fe, New Mexico 87504

Attention: Mr. Robert L. Myers II
Petroleum Engineer Specialist

File: GDH-2163-988.GW00

Discharge Plan GW-13 Renewal
Burton Flats Gasoline Plant
Eddy County, New Mexico

As requested in your letter of February 2, 1994, we are providing the following comments and additional information required for approval of the subject Discharge Plan:

SECTION VII : The sumps are constructed by placing one metal container inside another metal container then set in concrete containment. Leak detection is by visual inspection from the top between the metal walls and outside metal wall and the concrete.

SECTION VIII: The oil from Amoco's slop oil tank is put in a slop oil tank at Oxy NGL's E & P compressor facility next to the Burton Flats Plant and then sold to Scurlock Permian Corp., 3514 Lovington Highway, Hobbs, New Mexico 88240.

SECTION IX:

Proposed testing procedure attached.

SECTION X: Contingency Plan attached with NMOCD Rule 116 included.



List of chemicals used at plant:

Oils - Citgo Pacemaker 1000
Citgo Refrig. Oil 54 LP
Citgo Pacemaker 68
Citgo Amplex 22

Antifreeze
DEA Amine
Methanol
Propane

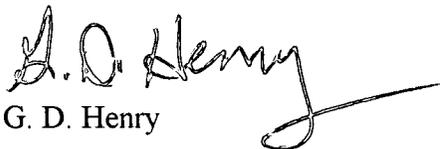
All domestic waste hauled to Carlsbad Landfill operated by New Mex Landfill, Inc., P. O. Box 580, Sunland Park, New Mexico 88063. NMED permit pending.

Pit closure procedure will be altered to initially test sludge in pit for TPH and BTEX. Test results will be submitted to OCD and procedures approved prior to closure.

We have attached a corrected draft in the amount of \$1717.50 to cover the filing fee and one half of the flat fee. A revised copy of the discharge piping plan which includes the CO2 3" PVC line to vent to the south sump is enclosed. This line was inadvertently left of the original plat.

Please contact Karl McGinnis at (713) 366-7362 if additional information is required.

Sincerely,


G. D. Henry

KLM/jsl

Enclosures

cc: NMOCD District II, 811 South First Street,
P. O. Drawer DD, Artesia, NM 88210

DRAIN LINE TEST PROCEDURE

Discharge Plan GW-13 Burton Flats Gas Plant

A. Drain Line

1. Block in Inlet Scrubber drain.
2. Block in Residue Suction Scrubber drain.
3. Block in Inlet Suction Scrubber drain.
4. Block in Propane Suction Scrubber drain.
5. Block in Oil Drain sump.
6. Block in water dump on Coalescer skid.
7. Block in Inlet Filter Separator drain.
8. Block in Amine sump.
9. Block in South sump.
10. Tie pressure test line into valve located on the east side of process skid on the end of the economizer drain line.
11. Pressure test with Residue Gas up to 20 pounds for 5 minutes.

B. CO2 Vent Drain

1. Block line at Amine Reflux Scrubber.
2. Block Drain Line at South sump.
3. Tie pressure line into CO2 to vent meter run.
4. Pressur test with Residue Gas up to 20 pounds for 5 minutes.

C. Oil Drain Line

1. Block drain line at north end of engine skid on oil drain line.
2. Block drain line a north drain sump located inside on east side.
3. Tie pressure into connection located on north end of engine skid on oil drain line.
4. Pressure test with Residue Gas up to 20 pounds for 5 minutes.

BURTON FLATS GAS PROCESSING PLANT

CONTINGENCY PLAN

A. 1. Oil and Produced Water Spills

In the event of an oil or produced water spill, the person discovering it should immediately notify the appropriate supervisor in charge. This person should assess the situation and stop the source of the spill if it may be safely accomplished. The supervisor in charge should proceed to the spill site and direct control and containment activities. He should assess the need for additional assistance and equipment. Upon assessment the supervisor in charge should immediately contact the Plant Foreman, the AMOCO HOTLINE (713) 366-7500, and the Environment, Health and Safety Coordinator as appropriate.

Immediate notification of district NMOCD office, (505) 748-1283, is required for spills or leaks of 25 bbls. or more of crude oil or condensate or 100 barrels or more of salt water. Written notification is required for spills or leaks of five bbls. or more of oil or condensate or 25 bbls. or more of salt water. (See attached NMOCD Rule 116.)

2. Chemical Spills

In the event of a chemical spill, the person discovering the spill should contact the appropriate supervisor. The person discovering the release should not attempt any identification, control or containment without the proper personal protective equipment. Upon proper identification of the chemical, the supervisor should contact the EH&S Coordinator or other EH&S staff through the AMOCO HOTLINE or consult the Material Safety Data Sheets for hazardous characteristics and proper handling procedures.

Chemtrec (800-424-9300) may be contacted with any questions concerning response or chemical hazards.

After proper handling procedures have been identified, control and containment should begin. The supervisor in charge should proceed to the spill site and direct control and containment activities. He should assess the need for additional assistance and equipment.

Upon assessment, the supervisor should immediately contact the Plant Foreman, the EH&S Coordinator, and the AMOCO HOTLINE as appropriate.

RULE 116 - NOTIFICATION OF FIRE, BREAKS, LEAKS, SPILLS AND BLOWOUTS

- A. The Division shall be notified of any fire, break, leak, spill, or blowout occurring at any injection or disposal facility or at any oil or gas drilling, producing, transporting, or processing facility in the State of New Mexico by the person operating or controlling such facility.
- B. "Facility," for the purpose of this rule, shall include any oil or gas well, any injection or disposal well, and any drilling or workover well; any pipe line through which crude oil, condensate, casinghead or natural gas, or injection or disposal fluid (gaseous or liquid) is gathered, piped, or transported (including field flow-lines and lead-lines but not including natural gas distribution systems); any receiving tank, holding tank, or storage tank, or receiving and storing receptacle into which crude oil, condensate, injection or disposal fluid, or casinghead or natural gas is produced, received, or stored; any injection or disposal pumping or compression station including related equipment; any processing or refining plant in which crude oil, condensate, or casinghead or natural gas is processed or refined; and any tank or drilling pit or slush pit associated with oil or gas well or injection or disposal well drilling operations or any tank, storage pit, or pond associated with oil or gas production or processing operations or with injection or disposal operations and containing hydrocarbons or hydrocarbon waste or residue, salt water, strong caustics or strong acids, or other deleterious chemicals or harmful contaminants.
- C. Notification of such fire, break, leak, spill, or blowout shall be in accordance with the provisions set forth below.
- 1) Well Blowouts. Notification of well blowouts and/or fires shall be "immediate notification" described below. ("Well blowout" is defined as being loss of control over and subsequent eruption of any drilling or workover well, or the rupture of the casing, casinghead, or wellhead or any oil or gas well or injection or disposal well, whether active or inactive, accompanied by the sudden emission of fluids, gaseous or liquid, from the well.)
 - 2) "Major" Breaks, Spills, or Leaks. Notification of breaks, spills, or leaks of 25 or more barrels of crude oil or condensate, or 100 barrels or more of salt water, none of which reaches a watercourse or enters a stream or lake; breaks, spills, or leaks in which one or more barrels of crude oil or condensate or 25 barrels or more of salt water does reach a watercourse or enters a stream or lake; and breaks, spills, or leaks of hydrocarbons or hydrocarbon waste or residue, salt water, strong caustics or strong acids, gases, or other deleterious chemicals or harmful contaminants of any magnitude which may with reasonable probability endanger human health or result in substantial damage to property, shall be "immediate notification" described below.

- 3) “Minor” Breaks, Spills, or Leaks. Notification of breaks, spills, or leaks of 5 barrels or more but less than 25 barrels of crude oil or condensate, or 25 barrels or more but less than 100 barrels of salt water, none of which reaches a watercourse or enters a stream or lake, shall be “subsequent notification” described below.
- 4) Gas Leaks and Gas Line Breaks. Notification of gas leaks from any source or of gas pipe line breaks in which natural or casinghead gas of any quantity has escaped or is escaping which may with reasonable probability endanger human health or result in substantial damage to property shall be “immediate notification” described below. Notification of gas pipe line breaks or leaks in which the loss is estimated to be 1000 or more MCF of natural or casinghead gas but in which there is no danger to human health nor of substantial damage to property shall be “subsequent notification” described below.
- 5) Tank Fires. Notification of fires in tanks or other receptacles caused by lightning or any other cause, if the loss is, or it appears that the loss will be, 25 or more barrels of crude oil or condensate, or fires which may with reasonable probability endanger human health or result in substantial damage to property, shall be “immediate notification” as described below. If the loss is, or it appears that the loss will be at least 5 barrels but less than 25 barrels, notification shall be “subsequent notification” described below.
- 6) Drilling Pits, Slush Pits, and Storage Pits and Ponds. Notification of breaks and spills from any drilling pit, slush pit, or storage pit or pond in which any hydrocarbon or hydrocarbon waste or residue, strong caustic or strong acid, or other deleterious chemical or harmful contaminant endangers human health or does substantial surface damage, or reaches a watercourse or enters a stream or lake in such quantity as may with reasonable probability endanger human health or result in substantial damage to such watercourse, stream, or lake, or the contents thereof, shall be “immediate notification” as described below. Notification of breaks or spills of such magnitude as to not endanger human health, cause substantial surface damage, or result in substantial damage to any watercourse, stream, or lake, or the contents thereof, shall be “subsequent notification” described below, provided however, no notification shall be required where there is no threat of any damage resulting from the break or spill.
- 7) Immediate Notification. “Immediate Notification” shall be as soon as possible after discovery and shall be either in person or by telephone to the district office of the Division district in which the incident occurs, or if the incident occurs after normal business hours, to the District Supervisor, the Oil and Gas Inspector, or the Deputy Oil and Gas Inspector. A complete written report (“Subsequent Notification”) of the incident shall also be submitted in

DUPLICATE to the appropriate district office of the Division within ten days after discovery of the incident.

- 8) Subsequent Notification. "Subsequent Notification" shall be a complete written report of the incident and shall be submitted in duplicate to the district office of the Division district in which the incident occurred within ten days after discovery of the incident.
- 9) Content of Notification. All reports of fires, breaks, leaks, spills, or blowouts, whether verbal or written, shall identify the location of the incident by quarter-quarter, section, township, and range, and by distance and direction from the nearest town or prominent landmark so that the exact site of the incident can be readily located on the ground. The report shall specify the nature and quantity of the loss and also the general conditions prevailing in the area, including precipitation, temperature, and soil conditions. The report shall also detail the measures that have been taken and are being taken to remedy the situation reported.
- 10) Watercourse, for the purpose of this rule, is defined any lake-bed or gully, draw, stream bed, wash, arroyo, or natural or man-made channel through which water flows or has flowed.



STATE OF NEW MEXICO

ENERGY MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

February 9, 1994

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

CERTIFIED MAIL
RETURN RECEIPT NO. P-176-012-060

Mr. G. D. Henry
Manager, Environment, Health and Safety
Amoco Production Company
P.O. Box 3092
Houston, TX 77253-3092

**RE: Discharge Plan Requirement
Burton Flats Gas Processing Plant
Eddy County, New Mexico**

Dear Mr. Henry,

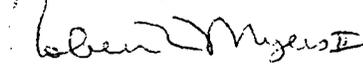
Please find enclosed the draft for the amount of \$3385.00 submitted to the Oil Conservation Division on February 1, 1993 to cover the filing fee and flat fee for the discharge plan renewal application for the Burton Flats Gas Processing Plant. Under the provisions of the Water Quality Control Commission (WQCC) Regulation 3-114 Section B.3, billable facilities submitting a discharge plan renewal will be assessed a fee equal to the filing fee plus one-half of the flat fee or the discharge fee, whichever is applicable. Therefore, the appropriate fee for this application should be

filing fee	\$ 50.00
<u>flat fee</u>	<u>\$1667.50</u>
Total	\$1717.50

The \$50.00 filing fee should be submitted as soon as possible since it is to accompany the application. The flat fee can be included in the same draft, or it can be paid when Amoco receives the discharge plan renewal and invoice.

If there are any questions on this matter, please contact me at 827-4080.

Sincerely,


Robert L. Myers II
Petroleum Engineer Specialist

RLM/rlm
XC: OCD Artesia Office

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 follow-
ing discharge plan 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, Tele-
phone (505) 827-5800:

(GW-13) - Amoco Production
Company, David Henry, Manager,
Environment, Health and Safety,
P.O. Box 3092, Houston, Texas,
77253-3092, has submitted an
application for renewal of its pre-
viously approved discharge plan for
the Burton Flats Gas Processing
Plant located in the SE/4, SW/4,
Section 14, Township 20 South,
Range 28 East, NMPM, Eddy Coun-
ty, New Mexico. There are no
continuous flows of wastewater
from any plant processes. Any
unplanned wastewater generated
is collected in on-site storage
tanks and disposed of in a UIC-
permitted Class II disposal well.
Groundwater most likely to be
affected by a spill, leak, or
accidental discharge to the surface
is at a depth of approximately 140
feet with a total dissolved solids
concentration ranging from 3000
mg/l. The discharge plan addres-
ses how spills, leaks, and other
accidental discharges to the sur-
face will be managed, as well as
disposal of waste oil and solid
wastes.

Any interested person may obtain
further information from the Oil Con-
servation Division and may submit
written comments to the Director of
the Oil Conservation Division at the
address given above. The discharge
plan application may be viewed at the
above address between 8:00 a.m.
and 4:00 p.m., Monday through Fri-
day. Prior to ruling on any proposed
discharge plan or its modification, the
Director of the Oil Conservation Divi-
sion 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 should be held. A
hearing will be held if the Director
determines there is significant public
interest.

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

GIVEN under the Seal of New
Mexico Oil Conservation Division at
Santa Fe, New Mexico, on this 14th
day of January, 1994.

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

Journal: February 12, 1994

STATE OF NEW MEXICO
County of Bernalillo
OIL CONSERVATION DIVISION
RECEIVED
SS

94 FEB 21

Bill Tafaya being duly sworn declares and says that he is Classified
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 12 day
of Feb., 1994, and the subsequent consecutive publications
on _____, 1994

Bill Tafaya

Sworn and subscribed to before me, a notary Public in
and for the County of Bernalillo and State of New
Mexico, this 14 day of Feb 1994.

PRICE \$31.62

Statement to come at end of month.

3-22-97

CLA-22-A (R-1/93) ACCOUNT NUMBER C 81184

Affidavit of Publication

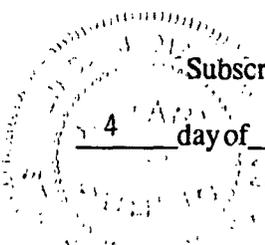
State of New Mexico,
County of Eddy, ss.

Amy McKay
being first duly sworn, on oath says:

That she is Business Manager
of the Carlsbad Current-Argus, a newspaper published daily at the City of Carlsbad, in said county of Eddy, state of New Mexico and of general paid circulation in said county; that the same is a duly qualified newspaper under the laws of the state wherein legal notices and advertisements may be published; that the printed notice attached hereto was published in the regular and entire edition of said newspaper and not in supplement thereof on the date as follows, to wit:

FEBRUARY 4, 1994
_____, 19____
_____, 19____
_____, 19____
_____, 19____
_____, 19____

That the cost of publication is \$ 43.57,
and that payment thereof has been made and will be assessed as court costs.



Amy McKay
Subscribed and sworn to before me this

4 day of FEBRUARY, 1994
Linda Hartel

My commission expires 7/22/96
Notary Public

February 4, 1994
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-13)- Amoco Production Company, David Henry, Manager, Environment, Health and Safety, P.O. Box 3092, Houston, Texas, 77253-3092, has submitted an application for renewal of its previously approved discharge plan for the Burton Flats Gas Processing Plant located in the SE/4, SW/4, Section 14, Township 20 south, Range 28 East, NMPM, Eddy County, New Mexico. There are no continuous flows of wastewater from any plant processes. Any unplanned wastewater generated is collected in on-site storage tanks and disposed of in a UIC-permitted Class II disposal well. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 140 feet with a total dissolved solids concentration ranging from 3000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed, as well as disposal of waste oil and solid wastes.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. 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 31th day of January, 1994.
STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
WILLIAM J. LEMAY,
Director



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

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

February 2, 1994

CERTIFIED MAIL
RETURN RECEIPT NO. P-176-012-058

Mr. G. D. Henry
Manager, Environment, Health and Safety
Amoco Production Company
P.O. Box 3092
Houston, TX 77253-3092

RE: Discharge Plan GW-13 Burton Flats Gas Plant

Dear Mr. Henry,

On July 15, 1993 the New Mexico Oil Conservation Division (OCD) notified you that the approved discharge plan, GW-13, for the Burton Flats Gas Plant, located in the SE/4, SW/4 of Section 14, Township 20 South, Range 28 East, NMPM, Eddy County, New Mexico, would expire on February 20, 1994. A discharge plan application was received by the OCD on February 1, 1994. The following comments and requests for additional information are based on the review of this application. Additional comments and requests may be forthcoming, pending an OCD inspection of the facility.

- In Section VII, the application states that each of the three sumps has secondary containment. Does this include a method for leak detection between the primary and secondary containment? Submit an explanation and/or diagram of the leak detection design.
- Section VIII contains a statement identifying Oxy NGL Inc. as recipient of Amoco's slop oil tank effluent. Submit documentation of OCD approval of the Oxy NGL facility for commercial wastewater treatment, or OCD discharge plan permit number.
- In Section IX of the application, Amoco proposes to pressure test drain lines on an annual basis. Submit a proposed method for testing prior to the initial testing for OCD approval.

Mr. G. D. Henry
February 2, 1994
Page 2

- Section X of the application, "CONTINGENCY PLAN", discusses notification and cleanup procedures for leaks or spills of oil, salt water and chemicals. Amoco should be aware of OCD notification requirements in OCD Rule 116 for spills "of any magnitude which may with reasonable probability endanger human health or result in substantial damage to property, shall be immediate notification." A copy of Rule 116 is enclosed for Amoco to incorporate into their spill reporting and clean-up procedures.
- Submit a list of all chemicals used at this facility, including those used for gas processing, engine maintenance and cleaning.
- Are there any domestic wastes produced at this site, and if so, how are they disposed of?
- In the pit closure procedure, Amoco proposes to test the sludge material for TCLP metals and organics. If Amoco anticipates landfarming this sludge on-site, it should also be tested for TPH and BTEX. However, the proposed procedure is adequate if the sludge is to be sent to a commercial landfarm or disposal facility. Test results shall be submitted to OCD and procedures approved prior to closure of the pit.

Submittal of the requested information and commitments in a timely fashion will expedite the final review of the application and approval of the discharge plan renewal.

If you have any questions, please contact me at (505) 827-4080.

Sincerely,



Robert L. Myers II
Petroleum Engineer Specialist

RLM/rlm

xc: OCD Artesia Office

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-13) - Amoco Production Company, David Henry, Manager, Environment, Health and Safety, P. O. Box 3092, Houston, Texas, 77253-3092, has submitted an application for renewal of its previously approved discharge plan for the Burton Flats Gas Processing Plant located in the SE/4, SW/4, Section 14, Township 20 South, Range 28 East, NMPM, Eddy County, New Mexico. There are no continuous flows of wastewater from any plant processes. Any unplanned wastewater generated is collected in on-site storage tanks and disposed of in a UIC-permitted Class II disposal well. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 140 feet with a total dissolved solids concentration ranging from 3000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed, as well as disposal of waste oil and solid wastes.

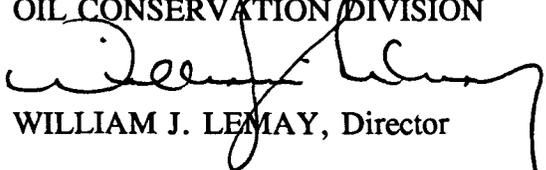
Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. 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 31th day of January, 1994.

S E A L

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION


WILLIAM J. LEMAY, Director



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

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

January 31, 1994

ALBUQUERQUE JOURNAL
717 Silver Southwest
Albuquerque, New Mexico 87102

RE: NOTICE OF PUBLICATION

ATTN: ADVERTISING MANAGER

Dear Sir/Madam:

Please publish the attached notice one time immediately on receipt of this request. Please proofread carefully, as any error in a land description or in a key word or phrase can invalidate the entire notice.

Immediately upon completion of publication, please send the following to this office:

1. **Publisher's affidavit in duplicate.**
2. **Statement of cost (also in duplicate.)**
3. **CERTIFIED invoices for prompt payment.**

We should have these immediately after publication in order that the legal notice will be available for the hearing which it advertises, and also so that there will be no delay in your receiving payment.

Please publish the notice no later than February 4, 1994.

Sincerely,

Sally E. Martinez
Sally E. Martinez
Administrative Secretary

Attachment

P 176 013 223

Receipt for
Certified Mail

No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to	<i>Journal</i>
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	



STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

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

January 31, 1994

CARLSBAD CURRENT ARGUS
P. O. Box 1629
Carlsbad, New Mexico 88221

RE: NOTICE OF PUBLICATION

ATTN: ADVERTISING MANAGER

Dear Sir/Madam:

Please publish the attached notice one time immediately on receipt of this request. Please proofread carefully, as any error in a land description or in a key word or phrase can invalidate the entire notice.

Immediately upon completion of publication, please send the following to this office:

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Sincerely,

Sally Martinez
Sally E. Martinez
Administrative Secretary

Attachment

P 176 013 222

Receipt for
Certified Mail
No Insurance Coverage Provided
Do not use for International Mail
(See Reverse)

Sent to <i>Carlsbad</i>	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

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-13) - Amoco Production Company, David Henry, Manager, Environment, Health and Safety, P. O. Box 3092, Houston, Texas, 77253-3092, has submitted an application for renewal of its previously approved discharge plan for the Burton Flats Gas Processing Plant located in the SE/4, SW/4, Section 14, Township 20 South, Range 28 East, NMPM, Eddy County, New Mexico. There are no continuous flows of wastewater from any plant processes. Any unplanned wastewater generated is collected in on-site storage tanks and disposed of in a UIC-permitted Class II disposal well. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 140 feet with a total dissolved solids concentration ranging from 3000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed, as well as disposal of waste oil and solid wastes.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. 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 31th day of January, 1994.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION


WILLIAM J. LEMAY, Director

S E A L

AMOCO PRODUCTION COMPANY
TULSA, OKLAHOMA

Form 587 May 86

PO Box 3092, Houston TX 77253

Location January, 1994

No. 528414

No Protest

At Sight

Pay To The Order of New Mexico Water Quality Management Fund \$3,385.00*****

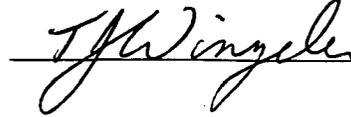
PROPERLY ENDORSE THIS ITEM AND NEGOTIATE AS A CHECK

Three Thousand Three Hundred Eighty-five Dollars and no/100 Doll

In Payment of Renewal of Burton Flats Gasoline Plant Discharge Plan GW-13
charge to: Burton Flats Gasoline Plant Account (9635-080)

PAYABLE THROUGH
The First National Bank and Trust Company
Tulsa, Oklahoma

88-1
1039 }



⑈528414⑈ ⑆103900010⑆ 0030098⑈

received 2/1/94

renewal

GW-13

Amoco Prod. Co.

Burton Flats Gas Plant

\$50 filing fee

\$ 3335 flat fee — should be \$1667.50 for renewal

\$3385



Amoco Production Company

South Permian Basin
Business Unit
501 WestLake Park Boulevard
Post Office Box 3092
Houston, Texas 77253-3092

G. D. Henry
Manager, Environment,
Health and Safety

January 31, 1994

RECEIVED

FEB 01 1994

CONSERVATION DIV
SANTA FE

State of New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
P. O. Box 2088
State Land Office Building
Santa Fe, New Mexico 87504

Attention: Mr. Roger C. Anderson
Environmental Bureau Chief

File: GDH-2152-988.GW00

**Discharge Plan GW-13 Renewal
Burton Flats Gasoline Plant
Eddy County, New Mexico**

Amoco Production Company purchased the Burton Flats Gasoline Plant from Trident NGL, Inc. and the subject discharge plan was transferred to Amoco by Trident.

We are enclosing the Original and one copy of the data required to renew this plan that will expire on February 20, 1994. A draft in the amount of \$3385.00 to cover the filing fee and flat fee is also enclosed.

The process operation of the plant has not changed from the previous plan filed in February, 1989, but secondary containment has been added and discharge piping system has been revised. All lines to the overflow/evaporation pit have been disconnected and a proposal to close this pit is enclosed for your approval.

Please contact Karl McGinnis at (713) 366-7362 if additional information is required.

Sincerely,

G. D. Henry

G. D. Henry *GH*

cc: NMOCD District II, 811 South First Street,
P. O. Drawer DD, Artesia, NM 88210



BURTON FLATS GAS PLANT PIT CLOSURE

The South Permian Basin Business Unit (SPBBU) of Amoco Production Company requests approval to close an overflow/evaporation pit at its Burton Flats Gas Plant. Background data and closure plans are addressed below.

Background Data

The SPBBU purchased the Burton Flats Gas Plant from Trident NGL, Inc. in December, 1992. It is located in Section 14, R-28-E, T-20-S, Eddy County, New Mexico. The plant has one overflow/evaporation pit located in the northeast corner of the plant. Pit measurements are 64' X 64' X 18'. The pit is lined, netted and contained at one time or another produced water, rain water, sediment oil, and miscellaneous hydrocarbons. It is our understanding that a new liner was installed in 1987. Prior to the purchase of the plant, the SPBBU conducted a Phase II environmental assessment which included the drilling of three ground water monitoring wells. One of the monitoring wells was drilled approximately 36 feet down gradient from the southwest corner of the pit. Fluid level as measured in December 1993 was 36.30 feet. BTEX sample analysis showed non detect. The pit has been disconnected from all lines and currently is holding approximately one foot of sludge material.

Pit Closure Procedure

- 1) Conduct random, composite sampling of sludge material in pit. Test for TCLP Metals and Organics.
- 2) Proper disposal or remediation of pit sludge based on lab analysis with BLM and NMOCD approval.
- 3) Inspect pit liner for leaks. If no leaks are found, roll liner into pit and backfill with pit surface material and native soil. If leaks are found in the liner, remove liner from that section(s) and remediate or dispose of contaminates per BLM and NMOCD requirements. Roll liner into pit and backfill with pit surface material and native soil.
- 4) Contour pit surface area to surrounding land. Excess fill material will be stockpiled onsite and utilized for future settling of the pit surface area.
- 5) Reseed pit area for local vegetation.
- 6) Documentation of all work associated with the pit closure including copies of sample analyses and a plat showing location of pit and sample coordinates will be filed onsite at the plant for historical reference.

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.)

- I. TYPE: Gas Processing Plant
- II. OPERATOR: Amoco Production Company
ADDRESS: P. O. Box 3092, Houston, TX 77253
CONTACT PERSON: Karl McGinnis PHONE: (713)366-7362
- III. LOCATION: SE /4 SW /4 Section 14 Township 20-S Range 28-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: G. D. Henry Title: Mgr., Env., Health & Safety

Signature: 

Date: 1/31/94

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

AMOCO PRODUCTION COMPANY

Burton Flats Gas Processing Plant

Discharge Plan Renewal

I. TYPE OF OPERATION

The plant has a design capacity of 8 MMSCFD. Major plant processes include inlet, residue, refrigeration, compression, dehydration, and cryogenic recovery. Both residue gas and NGL's are sold via pipeline from the plant.

II. OPERATOR

Amoco Production Company
P. O. Box 3092
Houston, Texas 77253

JOMT Manager - Plants
D. R. King
(713) 366-7260

Burton Flats Gas Plant
P. O. Box 2227
Carlsbad, NM 88220

Operations Foreman
P. E. Haney (505) 397-8366
Asst. Maintenance Foreman
T. D. Meason (505) 887-5279

III. LOCATION OF DISCHARGE/FACILITY

SE/4, SW/4 Section 14, Township 20 South, Range 28 East, NMPM,
Eddy County, New Mexico. Topographic map - Figure 1.

IV. LANDOWNERS

U. S. Department of the Interior
Bureau of Land Management
P. O. Box 1778
Carlsbad, New Mexico 88220

V. FACILITY DESCRIPTION

Original Discharge Plan includes a detailed description of the facility. Figure 2 has been included as an updated site plan.

VI. SOURCES, QUANTITIES & QUALITY OF EFFLUENT & WASTE SOLIDS

A.

<u>SOURCE</u>	<u>TYPE EFFLUENT</u>	<u>QUANTITY</u>
Inlet Scrubber	Hydrocarbon Liquids	12 Bbls./Mo.
	Saltwater	20 Bbls./Mo.
Propane Scrubber	LPG	30 gallons/Mo.
Coalescer	Water	10 gallons/Mo.
Process System	Waste Lube Oil	50 gallons/Mo.
	Hydro. Filters	1/Mo.
	Engine Oil filters	4/Mo.
	Amine Filters	8 per year
	Biodegradable Degreasers	2 1/2 gallons/Mo.

B. Analysis of inlet and waste lube oil - Attachment 1.

VII. TRANSFER & STORAGE OF PROCESS FLUIDS & EFFLUENTS

A. All fluids listed in VI. above are pumped to the slop oil tank. Concrete secondary containment around process vessels and pumps are drained to sumps and fluid is pumped to slop oil tank.

B. Flow Schematics - Figure 2.

C. The three sumps are double lined with exterior cement and metal interiors.

The slop oil tank has a capacity of 100 barrels and is set in concrete secondary containment capable of holding the entire capacity. Tank is emptied when it contains approximately 75 barrels of fluid.

Chemical and lubrication storage is surrounded by concrete secondary containment capable of holding their contents.

All underground lines in drain system are new externally wrapped 3" schedule 40 with all valves and connections above ground.

VIII. EFFLUENT DISPOSAL

- A. There is no on-site disposal. All lines to evaporation pit have been disconnected and proposal for pit closure submitted with this renewal.

The contents of the slop oil tank are removed by B & E Trucking, 3005 South Canal Street, Carlsbad, NM 88220.

Oil is taken to Oxy NGL Inc. located next to the Burton Flats Plant. Oxy separates the oil and water.

Water is hauled to Myrtle Myra SWD, P. O. Box 4, Loco Hills, NM 88255
NMOCD: Order SWD-391

Filters removed to Amoco's Empire Abo Gasoline Plant and then to Procycle Metals, Inc. 433 E. Colinas Blvd. #1180, Irving, Texas
Permits: EPA ID #TX0988036026, TWC #41814, TACB #20903.

IX. INSPECTION, MAINTENANCE AND REPORTING

- A. The facilities are periodically visually inspected by the plant foreman. On a semi-annual basis the foreman will inspect vessels, tanks, sumps secondary containment and valves for leaks. The results of these inspections will be documented and become a part of this plan. Drain lines will be pressure tested on an annual basis.

X. CONTINGENCY PLAN

- A. 1. Oil and Produced Water Spills

In the event of an oil or produced water spill, the person discovering it should immediately notify the appropriate supervisor in charge. This person should assess the situation and stop the source of the spill if it may be safely accomplished. The supervisor in charge should proceed to the spill site and direct control and containment activities. He should assess the need for additional assistance and equipment. Upon assessment the supervisor in charge

should immediately contact the Plant Foreman, the AMOCO HOTLINE (713) 366-7500, and the Environment, Health and Safety Coordinator as appropriate.

Immediate notification of district NMOCD office, (505) 748-1283, is required for spills or leaks of 25 bbls. or more of crude oil or condensate or 100 barrels or more of salt water. Written notification is required for spills or leaks of five bbls. or more of oil or condensate or 25 bbls. or more of salt water.

2. Chemical Spills

In the event of a chemical spill, the person discovering the spill should contact the appropriate supervisor. The person discovering the release should not attempt any identification, control or containment without the proper personal protective equipment. Upon proper identification of the chemical, the supervisor should contact the EH&S Coordinator or other EH&S staff through the AMOCO HOTLINE or consult the Material Safety Data Sheets for hazardous characteristics and proper handling procedures.

Chemtrec (800-424-9300) may be contacted with any questions concerning response or chemical hazards.

After proper handling procedures have been identified, control and containment should begin. The supervisor in charge should proceed to the spill site and direct control and containment activities. He should assess the need for additional assistance and equipment.

Upon assessment, the supervisor should immediately contact the Plant Foreman, the EH&S Coordinator, and the AMOCO HOTLINE as appropriate.

B. Attachment 2 - Spill Clean-up Procedures

XI. SITE CHARACTERISTICS

A. Hydrogeology

The following information is being provided to supplement the hydrogeologic information previously provided in the Burton Flats Gas Plant Discharge Plan.

Prior to purchasing the Burton Flats Gas Plant, Amoco drilled three monitor wells to determine if groundwater was present, and if so, was there any contamination. The location of the three wells is shown on Figure 3. The wells vary in depth from 20' to a maximum of approximately 80'. A summary of the soil samples collected while drilling are found in Attachment 3. The driller's logs are also included as Attachment 4.

The wells have been sampled three times since they were drilled and there has never been any detectable hydrocarbons in the wells. The top of water seen in the wells varies from approximately 15'-37' (Attachment 5). The wells yield a very limited amount of water and it appears that the wells are completed in small aquitards. We will continue to sample the wells at least biannually to assure that no contamination occurs.



ARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

FINAL ANALYSIS REPORT

Company: Amoco Production Co.
Address: P.O. Box 67
City, State: Hobbs, NM 88241-0067

Date: 1/28/94
Lab#: H1473

Project Name: BFGP
Project Location: Burton Flats Gas Plant
Sampled by: CC Date: 12/29/93 Time: 10:00
Analyzed by: HM Date: 12/30/93 Time: 2:00
Type of Samples: Gas Product Sample Condition:

Units: mg/l

Samp #	Field Code	BENZENE	TOLUENE	ETHYL BENZENE	PARA-XYLENE	META-XYLENE	ORTHO-XYLENE
1	Inlet to Plant	199.709	<0.001	27.162	60.658	114.427	32.687

QC Recovery	0.935	0.882	0.906	0.883	0.868	0.899
QC Spike	0.881	0.867	0.874	0.877	0.869	0.893
Accuracy	106.1%	101.7%	103.7%	100.7%	99.9%	100.7%
Air Blank	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001

Methods - AUTOMATED HEADSPACE GC
- EPA SW-846; EPA METHODS 8020

Michael R. Fowler

Date 1-28-94



ARDINAL LABORATORIES

PHONE (915) 673-7001 • 2111 BEECHWOOD • ABILENE, TX 79603

PHONE (505) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

PHONE (505) 326-4669 • 118 S. COMMERCIAL AVE. • FARMINGTON, NM 87401

ANALYSIS REPORT

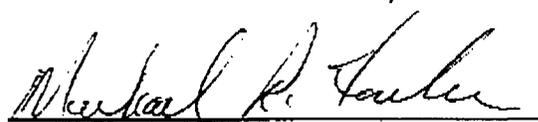
Company: Amoco Production Co. Date: 1/28/94
 Address: P.O. Box 67 Lab # H1473
 City, State: Hobbs, NM 88241

Project Name: BFGP
 Project Location: Burton Flats Gas Plant
 Sampled by: CC Date: 12/29/93
 Type of Sample: Gas Product Sample Condition:

Sample ID: Inlet to Plant

<u>PARAMETER</u>	<u>RESULT</u>	<u>UNITS</u>
Total Chlorides by G.C.	<0.1	mg/L
PCB	<0.002	mg/L
Uranium	<20.80	pCi/l
Radium 226	<58.57	pCi/l
Radium 228	<6.197	pCi/l
Silver	<0.01	mg/L

METHODS - EPA 9020; ASTM 4059-91; EPA 3005/7000; RTS-003, General Lab
 Procedures; Gamma Spectroscopy, Standard Methods; Marinelli Beaker
 Geometry



Date 1/28/94

Michael R. Fowler



CITGO Petroleum Corporation

P.O. Box 58 4500 S. 129th E. Ave. Tulsa, OK 74102 (918) 492-925

GAS ENGINE OIL ANALYSIS SERVICE

ACCOUNT TRIDENT
 LOCATION CARLSBAD NEW MEXICO
 SITE BURTON FLATS STATION
 ADDRESS
 PHONE NO. 505-887-5279

CITGO ENGINE ID 01890101C
 MAKE & MODEL IR RDS *Comp oil*
 OIL IN USE CITGO NGL
 CUSTOMER ID
 CONTACT CESAR ESPINO

SAMPLE ID	139- 54	109-169	89- 10	81- 69	53- 72	26- 25
DATE SAMPLED	05-17-93	04-15-93	03-25-93	03-15-93	02-16-93	01-19-93
DATE RECEIVED	05-19-93	04-19-93	03-30-93	03-22-93	02-22-93	01-26-93
DATE REPORTED	05-21-93	04-21-93	04-01-93	03-23-93	02-23-93	01-27-93
SERVICE HRS OIL	5448	4656	4200	3960	3312	2640
SERVICE HRS FILTER	-	4656	-	-	3312	2640
OIL ADDED (GALLONS)	-	-	-	-	-	-
HRS LAST OVERHAUL	77719	77215	76471	76231	75583	74911
TOTAL ENGINE HRS	-	-	-	-	-	-

ANALYTICAL DATA

VISCOSITY (SUS @ 210°F)	65.5	65.1	63.7	61.9	65.5	65.3
INSOLUBLES (% WT)	0.05	0.03	0.03	0.03	0.03	0.03
IR (OXIDATION)	1	1	1	1	1	1
IR (NITRATION)	1	1	1	1	1	1
WATER	NEG	POS #	NEG	NEG	NEG	NEG

METALS (PPM)

FE IRON	3	3	2	3	3	3
PB LEAD	0	2	0	2	2	2
CU COPPER	1	2	2	2	2	2
AL ALUMINUM	0	4	0	4	4	5
CR CHROMIUM	0	0	0	0	0	0
SN TIN	0	1	5	0	0	1
SI SILICON	0	2	1	4	2	3
NA SODIUM	0	0	4	1	1	0
B BORON	4	5	4	23 #	4	3
CA CALCIUM	1560	1558	1389	1461	1677	1618
BA BARIUM	17	23	19	27	31	37

RECOMMENDATIONS

OIL	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
FILTER	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
AIR FILTER	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
MAIN BEARING	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
ROD BEARING	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
CAM BEARING	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
BUSHING	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
CRANKSHAFT	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
LINER	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
PISTONS	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
RINGS	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
COOLING SYSTEM	O.K.	[CK]	O.K.	[CK]	O.K.	O.K.
RESAMPLE DAYS	30	10	30	10	30	30



CITGO Petroleum Corporation

P.O. Box 38 4500 S. 129th E. Ave. Tulsa, OK 74102 (918) 412-925

GAS ENGINE OIL ANALYSIS SERVICE

ACCOUNT TRIDENT
 LOCATION CARLSBAD NEW MEXICO
 SITE BURTON FLATS STATION
 ADDRESS
 PHONE NO. 505-887-5279

CITGO ENGINE ID 01890101E
 MAKE & MODEL WAUK L7042 *Engine*
 OIL IN USE CITGO NGL
 CUSTOMER ID
 CONTACT CESAR ESPINO

SAMPLE ID	139- 57	109-171	89- 9	81- 67	53- 71	29- 2
DATE SAMPLED	05-17-93	04-14-93	03-25-93	03-15-93	02-16-93	01-27-93
DATE RECEIVED	05-19-93	04-19-93	03-30-93	03-22-93	02-22-93	01-29-93
DATE REPORTED	05-21-93	04-21-93	04-01-93	03-23-93	02-23-93	02-01-93
SERVICE HRS OIL	3192	2400	1656	1416	768	144
SERVICE HRS FILTER	-	2400	-	-	768	144
OIL ADDED (GALLONS)	-	-	-	-	-	-
HRS LAST OVERHAUL	15360	14568	13824	13584	12936	12312
TOTAL ENGINE HRS	-	-	-	-	-	-

ANALYTICAL DATA

VISCOSITY (SUS @ 210°F)	73.0	71.9	69.2	68.2	70.1	70.1
INSOLUBLES (% WT)	0.07	0.06	0.07	0.06	0.06	0.05
IR (OXIDATION)	4	3	3	2	2	2
IR (NITRATION)	4	3	3	2	3	2
WATER	NEG	NEG	NEG	NEG	NEG	NEG

METALS (PPM)

FE IRON	8	6	6	5	4	2
PB LEAD	2	3	1	2	2	1
CU COPPER	1	2	2	2	1	1
AL ALUMINUM	2	4	1	4	4	5
CR CHROMIUM	0	0	0	0	0	0
SN TIN	0	0	0	0	0	0
SI SILICON	2	3	1	3	2	3
NA SODIUM	4	3	14	3	1	0
B BORON	6	4	2	8 *	2	4
CA CALCIUM	2043	1853	2061	1686	1812	1742
BA BARIUM	7	9	3	9	10	8

RECOMMENDATIONS

OIL	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
FILTER	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
AIR FILTER	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
MAIN BEARING	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
ROD BEARING	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
CAM BEARING	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
BUSHING	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
CRANKSHAFT	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
LINER	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
PISTONS	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
RINGS	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
COOLING SYSTEM	O.K.	O.K.	O.K.	[CK]	O.K.	O.K.
RESAMPLE DAYS	30	30	30	10	30	30



CITGO Petroleum Corporation

P.O. Box 58 4500 S. 129th E. Ave. Tulsa, OK 74102 (918) 482-9925

GAS ENGINE OIL ANALYSIS SERVICE

ACCOUNT TRIDENT
 LOCATION CARLSBAD NEW MEXICO
 SITE BURTON FLATS STATION
 ADDRESS
 PHONE NO. 505-887-5279

CITGO ENGINE ID 01890102X
 MAKE & MODEL MAFI TRENCH *EXPANDED*
 OIL IN USE CITGO AMPX22
 CUSTOMER ID
 CONTACT CESAR ESPINO

SAMPLE ID	139- 58	109-172	81- 66	53- 91	26- 27	363-142
DATE SAMPLED	05-17-93	04-14-93	03-15-93	02-16-93	01-19-93	12-23-92
DATE RECEIVED	05-19-93	04-19-93	03-22-93	02-22-93	01-26-93	12-28-92
DATE REPORTED	05-21-93	04-21-93	03-23-93	02-23-93	01-27-93	12-29-92
SERVICE HRS OIL	19777	18985	18244	17593	16921	16081
SERVICE HRS FILTER	-	18985	-	17593	16921	16081
OIL ADDED (GALLONS)	-	-	-	-	-	-
HRS LAST OVERHAUL	19777	18985	18241	17593	16921	-
TOTAL ENGINE HRS	19777	-	-	-	-	-

ANALYTICAL DATA

VISCOSITY (SUS @ 210°F)	45.4	46.2	45.7	46.1	46.1	45.8
INSOLUBLES (% WT)	0.03	0.03	0.03	0.03	0.03	0.03
IR (OXIDATION)	IR NOTE	-	-	-	-	-
IR (NITRATION)	-	-	-	-	-	-
WATER	NEG	NEG	NEG	NEG	NEG	NEG

IR NOTE: IR VALUES NOT DETERMINED FOR OIL TYPE USED

METALS (PPM)

FE IRON	1	1	6	2	3	3
PB LEAD	0	0	0	1	1	1
CU COPPER	0	1	1	3	3	2
AL ALUMINUM	0	0	0	0	0	0
CR CHROMIUM	0	0	0	0	0	0
SN TIN	0	0	0	0	0	0
SI SILICON	0	0	0	0	0	0
NA SODIUM	0	0	0	0	1	2
B BORON	0	0	1	3	3	0
CA CALCIUM	92	69	8	101	143	100
BA BARIUM	0	1	1	1	1	0

RECOMMENDATIONS

OIL	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
FILTER	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
AIR FILTER	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
MAIN BEARING	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
ROD BEARING	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
CAM BEARING	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
BUSHING	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
CRANKSHAFT	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
LINER	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
PISTONS	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
RINGS	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
COOLING SYSTEM	O.K.	O.K.	O.K.	O.K.	O.K.	O.K.
RESAMPLE DAYS	30	30	30	30	30	30

SOUTH PERMIAN BASIN BUSINESS UNIT SOIL REMEDIATION GUIDELINES FOR CRUDE OIL SPILLS

Following are the SPBBU soil remediation guidelines which are to be utilized in remediation operations for new hydrocarbon spills at active well sites, batteries and flowlines.

Minimum concentration levels for TPH shall be based on state regulatory requirements or SPBBU target levels, whichever is more stringent. SPBBU target levels for New Mexico and Texas consists of 0.1% (1000 ppm) for surface and subsurface TPH within the spill area. For those spills where an above ground remediation plot will be used, SPBBU target levels for TPH will be 0.5% (5000 ppm) or less. A summary and a copy of hydrocarbon spill regulations for Texas and New Mexico are found in Appendixes A and B, respectively. These appendixes should be consulted for specific state requirements for contaminate levels, risk based assessments, and reporting requirements.

The SPBBU has portable TPH analyzer machines for onsite TPH analysis or soil samples may be sent for offsite analysis to a SPBBU approved laboratory (Contact your Field EH&S Coordinator).

GUIDELINES

- 1) Notification
 - **ALL CRUDE OIL SPILLS/LEAKS** (as well as any other spill) **MUST** be immediately reported to the Amoco Hotline.
- 2) Initial Response
 - Source elimination and site security as appropriate.
 - Containment of spill material.
 - Site stabilization and immediate removal of free liquid.
- 3) Excavation
 - All hydrocarbon contaminated soil associated with the spill/leak containing more than 0.1% (1000 ppm) of TPH **MUST** be brought to the surface for remediation.
 - For crude oil spills/leaks which occur onto an area with prior existing hydrocarbon soil contamination, the **FRESH SPILL MUST** be excavated as outlined above. The prior hydrocarbon soil contamination shall be handled on a case by case basis. The EH&S Coordinator **MUST** be notified for guidance before any remediation activity begins on the prior existing contamination.
- 4) Remediation Of Soil
 - **Remediation** of the hydrocarbon contaminated soil **MUST** begin as soon as possible.

- **Insitu remediation** (in place) may be used for crude oil spills of one (1) barrel or less with a soil contamination depth of twelve (12) inches or less. The soil to be remediated must be mixed with clean ambient (surrounding) soil or other new soil to achieve a uniform mixture consisting of 0.1% (1000 ppm) or less of TPH. Should there be excess soil from this mixture that can not be leveled out within the spill area, it shall be placed in an onsite remediation plot no more than twelve (12) inches in depth for further biodegradation. In certain situations, exceptions to the insitu remediation guidelines may be warranted. **These exceptions MUST be approved by the EH&S Manager.** Contact your Field EH&S Coordinator for assistance.
- **Onsite landfarming** shall be used for **ALL** crude oil spills greater than one (1) barrel. The excavated soil must be mixed with clean ambient (surrounding) soil or other new soil to achieve a uniform mixture consisting of 0.5% (5000 ppm) or less of TPH. This mixture shall be placed in an onsite remediation plot no more than twelve (12) inches in depth for further biodegradation.
- The **EH&S Coordinator** shall be responsible for coordinating the:
 - **Sampling** of the remediated soil (*see Waste Management Guidelines, Section VI, SPBBU Soil Sampling Guidelines*),
 - **Documentation** of sample coordinates and remediation plot location,
 - **Analysis** of the remediated soil (portable TPH meter or outside lab) and
 - **Submitting** to the Houston EH&S Group the appropriate information as required by that state's spill reporting requirements (*see Appendix A for New Mexico and Appendix B for Texas*)

5) Remediation Costs

- Each separate, new crude oil spill at a facility, well site or flowline will be considered a single project. If projected remediation costs exceed the operators agreement allowance, an AFE must be sent to all working interest owners.
- **If an AFE is submitted, work should not commence (*excludes initial response, see Step #2*) until receipt of approval by:**
 - Working interest owners,
 - Exceptions to the WI owners approval may be warranted in emergency situations. Contact your Field EH&S Coordinator.
 - Appropriate regulatory agency(ies) and
 - SPBBU EH&S Group.

**BURTON FLAT GAS PLANT
GROUNDWATER MONITOR WELLS**

<u>SAMPLE LOCATION</u>	<u>SAMPLE DEPTH</u>	<u>DRILL CUTTINGS IPH - PPM</u>	<u>WATER SAMPLE IPH - PPM</u>	<u>WATER SAMPLE BENZENE</u>	<u>WATER SAMPLE TOLUENE</u>	<u>WATER SAMPLE ETHYLBENZENE</u>	<u>WATER SAMPLE XYLENE</u>
Groundwater MW #1	1'	84	TNT	ND	ND	ND	ND
	5'	35					
	20'	30					
	25'	28					
Groundwater MW #2	1'	168	TNT	ND	ND	ND	ND
	5'	44					
	20'	47					
	60'	50					
Groundwater MW #3	1'	83	TNT	ND	ND	ND	ND
	5'	62					
	15'	44					
	20'	43					

**TNT = Test Not Taken
ND = Non Detectable At Or Above 0.001 mg/l**



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

FINAL ANALYSIS REPORT

Company: Amoco Production Co.
 Address: P.O. Box 3092
 City, State: Houston, TX 77250-3092

Date: 2/22/93
 Lab#: H1155

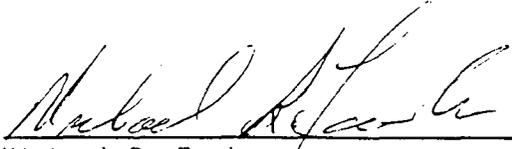
Project Name: Empire Abo
 Project Location: Artesia, NM

Sampled by: SN Date: 2/18/93 Time:
 Analyzed by: MF Date: 2/20/93 Time: 12:00

Type of Samples: Soil Sample Condition: GIST Units: mg/kg, mg/l

Samp #	Field Code	TRPHC	BENZENE	TOLUENE	ETHYL BENZENE	PARA-XYLENE	META-XYLENE	ORTHO-XYLENE	MTBE
1	Comp. NE 30"	183.3	***	***	***	***	***	***	***
2	BFGP #1-1'	84.0	***	***	***	***	***	***	***
3	BFGP #1-5'	35.2	***	***	***	***	***	***	***
4	BFGP #1-20'	30.0	***	***	***	***	***	***	***
5	BFGP #1-35'	28.0	***	***	***	***	***	***	***
6	BFGP #2-1'	167.5	***	***	***	***	***	***	***
7	BFGP #2-5'	43.6	***	***	***	***	***	***	***
8	BFGP #2-20'	47.2	***	***	***	***	***	***	***
9	BFGP #2-60'	49.7	***	***	***	***	***	***	***
	QC Recovery	350.2	***	***	***	***	***	***	***
	QC Spike	336.2	***	***	***	***	***	***	***
	Accuracy	104.2%	***	***	***	***	***	***	***
	Air Blank	***	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001

Methods - AUTOMATED HEADSPACE GC; INFRARED SPECTROSCOPY
 - EPA SW-846; EPA METHODS 8020, 418.1, 3540 OR 3510


 Michael R. Fowler

Date 2/22/93



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

FINAL ANALYSIS REPORT

Company: Amoco Production Co.
 Address: P.O. Box 3092
 City, State: Houston, TX 77250-3092

Date: 2/22/93
 Lab#: H1157

Project Name: Burton Flat Gas Plant
 Project Location:

Sampled by: T.W. Scott Date: 2/19/93 Time:
 Analyzed by: MF Date: 2/20/93 Time: 1:00
 Type of Samples: Soil Sample Condition: GIST

Units: mg/kg, mg/l

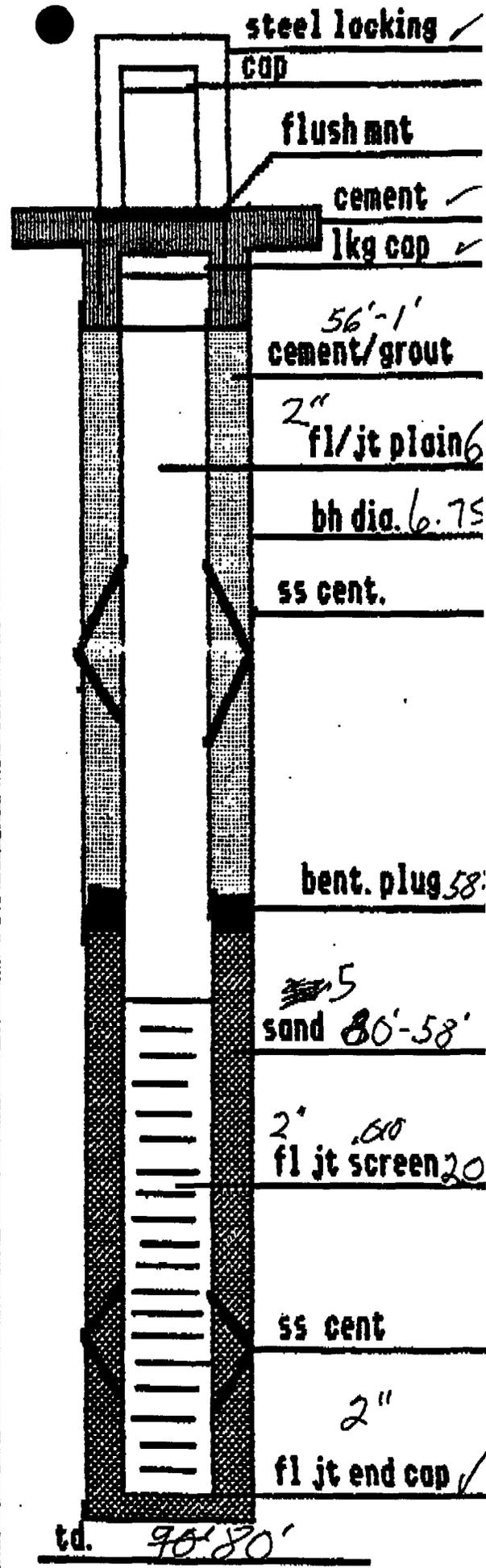
Samp #	Field Code	TRPHC	BENZENE	TOLUENE	ETHYL BENZENE	PARA-XYLENE	META-XYLENE	ORTHO-XYLENE	MTBE
1	BFGP #3-1'	83.4	***	***	***	***	***	***	***
2	BFGP #3-5'	62.0	***	***	***	***	***	***	***
3	BFGP #3-15'	44.2	***	***	***	***	***	***	***
4	BFGP #3-20'	42.9	***	***	***	***	***	***	***
	QC Recovery	350.2	***	***	***	***	***	***	***
	QC Spike	336.2	***	***	***	***	***	***	***
	Accuracy	104.2%	***	***	***	***	***	***	***
	Air Blank	***	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001

Methods - AUTOMATED HEADSPACE GC; INFRARED SPECTROSCOPY
 - EPA SW-846; EPA METHODS 8020, 418.1, 3540 OR 3510

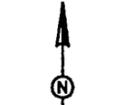

 Michael R. Fowler

Date 2/22/93

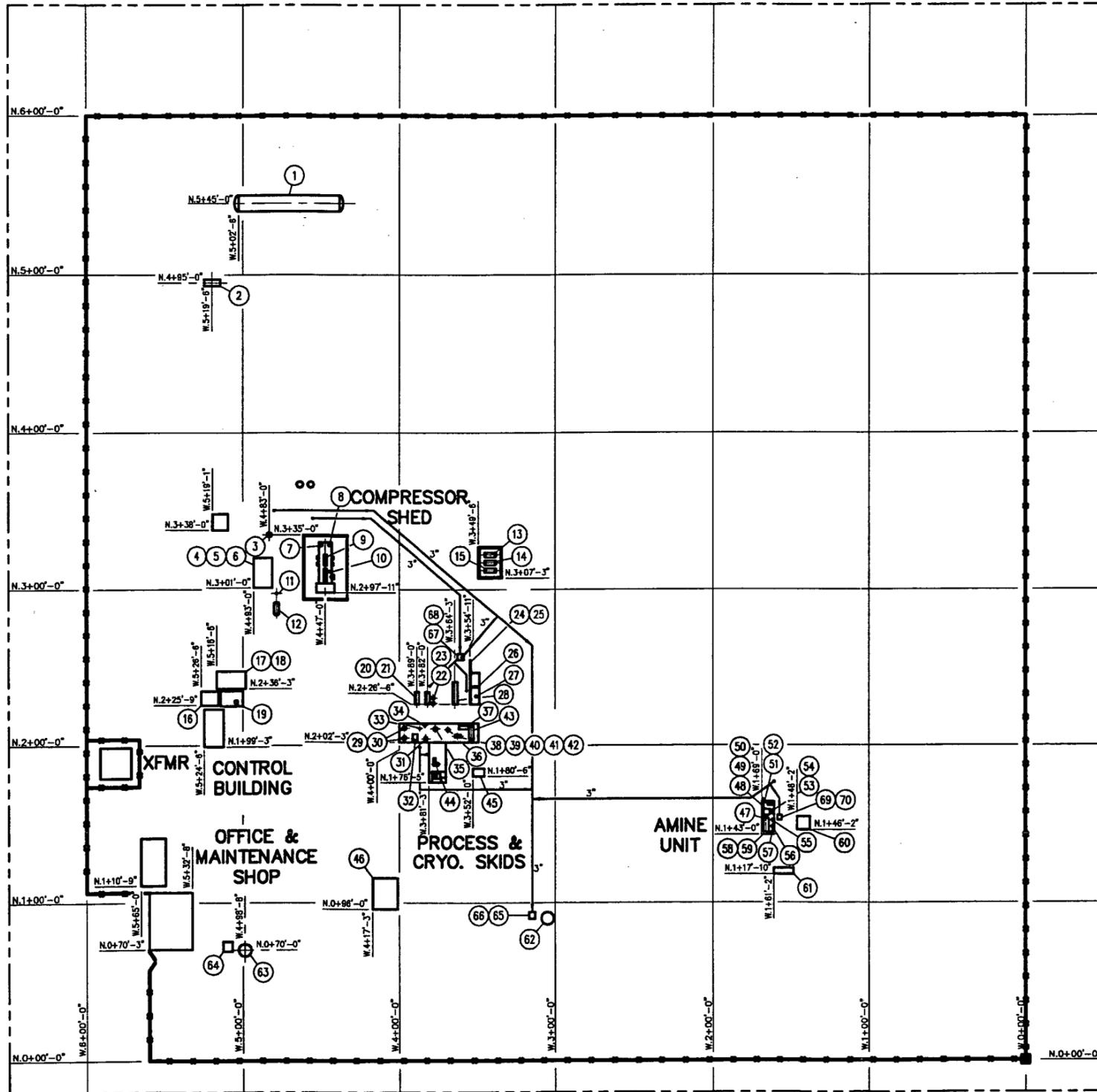
LOCATION: BFGP		WELL #: 2						
DESCRIPTION	FT.	FT.	START	STOP	SB	SB	OVM FT.	PPM
TS	0	2	12:15		1		1	0
R. Clay ^{crystal} + Gyp	2	14					5	0
W. R. Clay	14	19					10	0
Dry R. Clay	19	35					15	0
Blue Clay	35	36					20	0
R. Clay	36	64					25	0
R. SAND	64	90		3:15			60	0
							80	0
Casing + Sand + Pul			3:15	3:30				
Sand Bridged due to swelling clay								
Pulled casing holes stayed open, 80' TD								
Set 2" pipe			7:20	8:45				
+ Sand								
WL - 20'								



DWG NO. 93E34303



FACILITY NORTH



SCHEDULE OF EQUIPMENT

IT.#	TAG NO.	DESCRIPTION	IT.#	TAG NO.	DESCRIPTION
1	V6-2900	PROPANE STORAGE TANK	36	V-200	COLD SEPARATOR
2	F-1200	METER SKID	37	E-420	COLD GAS EXCHANGER
3	V-50	INLET SCRUBBER	38	E-400	WARM GAS EXCHANGER
4	AC-720	INLET GAS COOLER	39	E-410	COOL GAS EXCHANGER
5	AC-730	REFRIGERANT CONDENSER	40	E-430	DEMETHANIZER SIDE HEATER
6	AC-725	RESIDUE GAS COOLER	41	E-450	DEMETHANIZER REBOILER
7	V-201	RESIDUE GAS SCRUBBER	42	E-470	GAS CHILLER
8	V-101	INLET GAS SCRUBBER	43	V-270	REFRIGERANT SURGE TANK
9	K-610	COMPRESSOR	44	X-600/K-600	EXPANDER/COMPRESSOR
10	V-301	PROPANE SUCTION SCRUBBER	45	V2-1940	LUBE OIL STORAGE TANK
11	V-295	LUBE OIL KNOCKOUT	46	V2-410/V2-420	METHANOL STORAGE TANKS
12	V-280	REFRIGERANT LEVEL TANK	47	E-4	RICH/LEAN AMINE EXCHANGER
13	V2-1960	REFRIGERANT OIL STORAGE	48	E-1	AMINE COOLER
14	V2-1950	ENGINE AND COMP. OIL STORAGE	49	E-2	STILL OVERHEAD CONDENSER
15	V2-1310	ANTI-FREEZE STORAGE	50	E-3	WATER SUBCOOLER
16	E4-901	I.A. COMPRESSOR	51	P-1A	AMINE PUMP (N)
17	E4-900	I.A. COMPRESSOR (N)	52	P-1B	AMINE PUMP (S)
18	E4-910	I.A. COMPRESSOR (S)	53	P-2A	REFLUX PUMP (N)
19	V6-940	I.A. VOLUME TANK	54	P-2B	REFLUX PUMP (S)
20	P-20A	PIPELINE PUMP (E)	55	V-2	AMINE STILL
21	P-20B	PIPELINE PUMP (W)	56	F-2	CHARCOAL FILTER
22	P-10A	BOOSTER PUMP (E)	57	F-1	AMINE SOCK FILTER
23	P-10B	BOOSTER PUMP (W)	58	V-4	AMINE SURGE TANK (B)
24	E-5	SOUR/SWEET PROD. EXCH. (B)	59	V-3	AMINE REBOILER (T)
25	E-6	LEAN AMINE PRODUCT EXCH. (T)	60	V2-2710	AMINE STORAGE TANK
26	F-2700	COALESCER	61	H-750	REGENERATION GAS HEATER
27	V-1	AMINE CONTACTOR	62	V2-1820	SLOP OIL TANK
28	G8-2910	PROPANE EXCHANGER	63	V2-1400	WATER STORAGE TANK
29	V-110	DEHYDRATOR (N)	64	E10-410	WATER PUMP BUILDING
30	V-120	DEHYDRATOR (S)	65	V2-1810	DRAIN SUMP (SOUTH)
31	F-810	INLET GAS FILTER SEP.	66	E10-1810	DRAIN PUMP (SOUTH)
32	AC-710	REGENERATION GAS COOLER	67	V2-1800	DRAIN SUMP (NORTH)
33	F-800	INLET GAS FILTER	68	E10-1800	DRAIN PUMP (NORTH)
34	K-620	REGEN. GAS COMPRESSOR	69	V2-1820	AMINE DRAIN SUMP
35	T-1000	DEMETHANIZER	70	E10-1820	AMINE DRAIN PUMP

JAN 27 1994

REV. NO.	BY	DATE	REVISION	AMOCO APPROVED	DATE	OWNER APPROVED	DATE
A	JDR	1/27/93	ISSUED FOR REVIEW				



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BURTON FLATS PLANT
EDDY COUNTY, NEW MEXICO

AMOCO PRODUCTION COMPANY

DISCHARGE PIPING PLAN

1 OF 1

SCALE: 1"=40'-0"

PROJECT CODE: 93E34303

DRAWING NO: 93E34303

DATE: 12/93

CHECKED BY: DMH

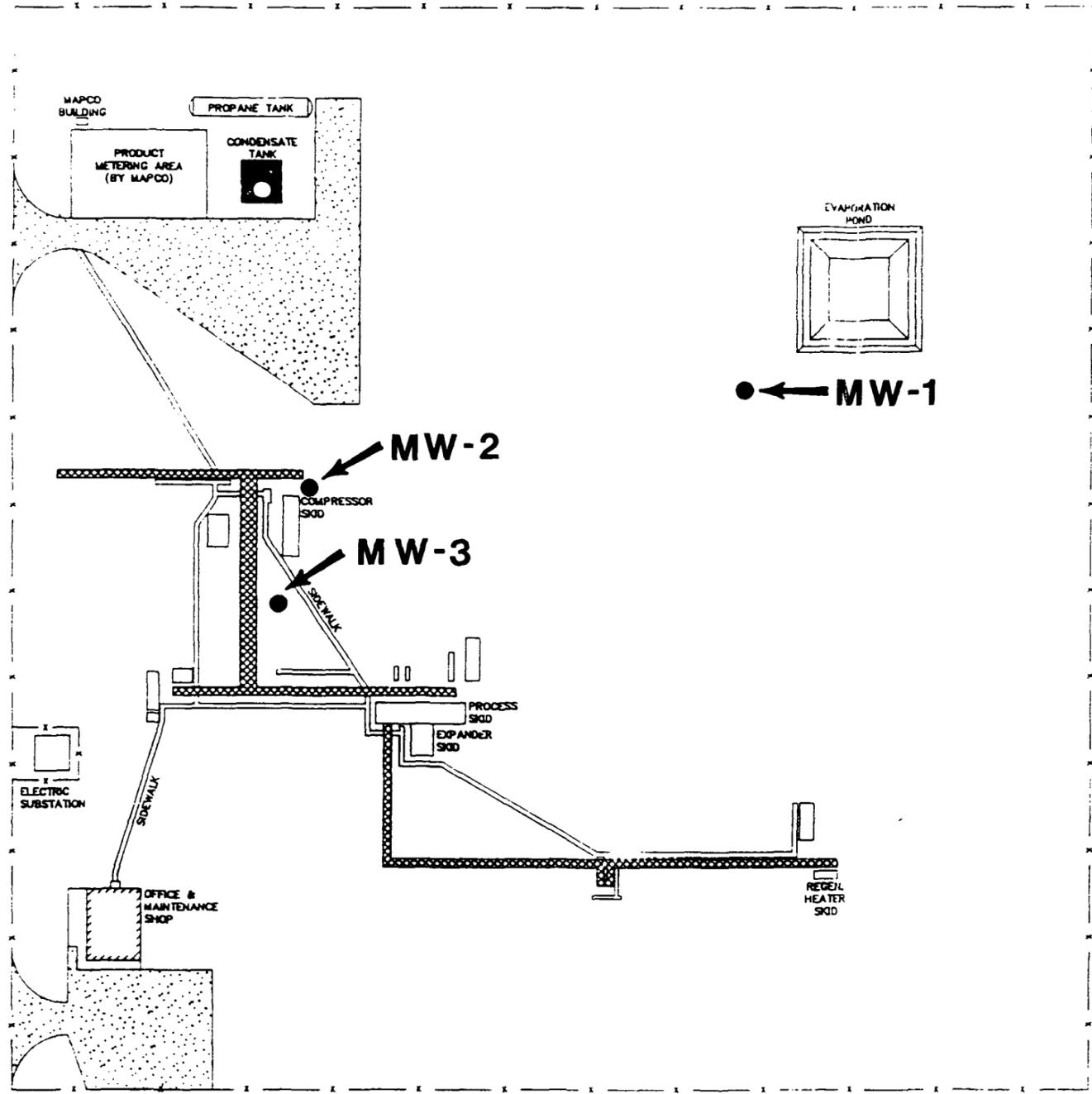
REV NO: 1

Filename: 93E34303.DWG

DRAWING NO. 10-1398-89

CHECKED BY [Signature] APPROVED BY [Signature]

DRAWN BY [Signature]



RE: SITE PLAN BY TULSA PRO-QUIP, INC. TITLED "PLOT PLAN BURTON FLATS PLANT" DATED 4-27-77.

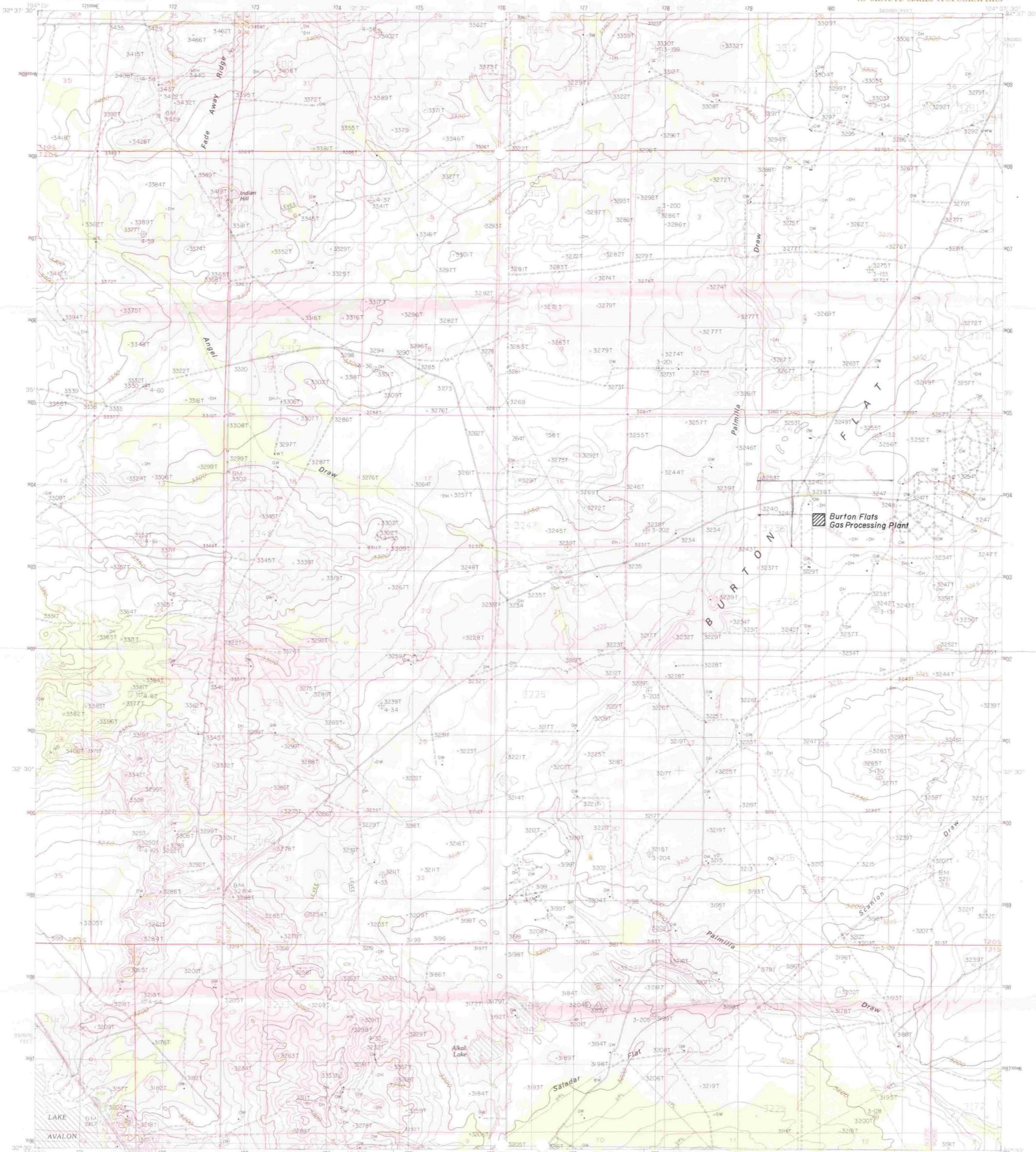
G&E
ENGINEERING, INC.
ENVIRONMENTAL CONSULTANTS

Amoco Production Company
Burton Flats Gas Plant
Carlsbad, New Mexico

SITE PLAN

DATE	NO.	REVISION	BY

Fig. No.



PRODUCED BY THE UNITED STATES GEOLOGICAL SURVEY
CONTROL BY USGS, NPS/NOAA
CHECKED FROM AERIAL PHOTOGRAPHS TAKEN 1977
FIELD CHECKED 1988 MAP EDITED 1985
PROJECTION TRANSVERSE MERCATOR
GRID-100-METER UNIVERSAL TRANSVERSE MERCATOR ZONE 11
3000-FOOT STATE GRID TICKS NEW MEXICO, EAST ZONE
UTM GRID DECLINATION 9°20' EAST
MAGNETIC NORTH DECLINATION BY EAST
VERTICAL DATUM NATIONAL GEODETIC VERTICAL DATUM OF 1929
HORIZONTAL DATUM 1927 NORTH AMERICAN DATUM
To place on the predicted North American Datum of 1983,
move the projection lines as shown by dashed corner ticks
(9 meters south and 47 meters east)
There may be private inholdings within the boundaries of any
Federal and State Reservations shown on this map
All marginal data and lettering generated and positioned by
automated type placement procedures

PROVISIONAL MAP
Produced from original
manuscript drawings. Infor-
mation shown as of date of
field check.



ROAD LEGEND

Improved Road
Unimproved Road
Trail
Interstate Route
U.S. Route
State Route

QUADRANGLE LOCATION

1	2	3	4	5	6	7	8

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
FOR SALE BY U.S. GEOLOGICAL SURVEY, DENVER, COLORADO 80225
OR RESTON, VIRGINIA 22092

ADJOINING 7.5 QUADRANGLES:
1 Lake Mead/El Estero
2 Illinois Camp NP
3 Illinois Camp NP
4 Lake Mead/El Estero
5 Illinois Camp NP
6 Carlsbad Well
7 Carlsbad Well
8 Indian Hill

SOLD BY
GAYLORD STICKLE CO. & ASSOC., INC.
Authorized Agents For U.S. Geological Survey Maps
Houston, Texas
529-8171

ANGEL DRAW, NEW MEXICO
PROVISIONAL EDITION 1985
32104-E2-T-024



OIL CONSERVATION DIVISION
RECEIVED

94 FEB 4 AM 8 35

Amoco Production Company

South Permian Basin
Business Unit
501 WestLake Park Boulevard
Post Office Box 3092
Houston, Texas 77253-3092

G. D. Henry
Manager, Environment,
Health and Safety

January 28, 1994

Mr. Roger C. Anderson
Environmental Bureau Chief
State of New Mexico
Energy, Minerals and Natural Resources Department
P. O. Box 2088
State Land Office Building
Santa Fe, New Mexico 87504

File: GDH-2150-988.GW00

Discharge Plan GW-13
Burton Flats Gas Processing Plant
Eddy County, New Mexico

Dear Mr. Anderson:

On February 20, 1994, our Discharge Plan is due to expire. We are writing you to ask for a permit renewal. We will be forwarding additional data to you next week which will complete our requirements for renewal. Included with the renewal request will be an update on hydrogeology and a plan for closing the evaporation pit at the site.

Thank you for your cooperation in this matter. If there are any questions, please contact me at (713)366-7170, or Karl McGinnis at (713)366-7362.

Sincerely,

G. D. Henry

KLM/jsl



Trident NGL, Inc.

Robert J. Cinq-Mars, Environmental Manager
10200 Grogans Mill Rd.
The Woodlands, Texas 77380
Telephone 713-364-6647
Facsimile 713-364-6632

OIL CONSERVATION DIVISION
RECEIVED



93 DE 20 AM 9 18

December 13, 1993

Mr. Roger Anderson
Environmental Bureau Chief
New Mexico Oil Conservation Division
P.O. Box 2088
Sante Fe, NM 87504

Re: Transfer of Burton Flats Plant Discharge Plan GW-13 from Trident NGL, Inc. to Amoco Production Company

Dear Mr. Anderson:

Trident NGL, Inc. sold the subject facility to Amoco Production Company in March, 1993. Trident has made Amoco aware of the existence of the plan and provided a copy thereof to Amoco. Please remove Trident as the operator for this plan.

Please feel free to contact me if you need further information on this matter.

Sincerely,

A handwritten signature in cursive script that reads 'Robert J. Cinq-Mars'.

Robert J. Cinq-Mars
Environmental Manager

cc. Mr. David Henry, Amoco Production Company
Mr. Fred Jones
File 3089.54

Robert J. Cinq-Mars, Environmental Manager
10200 Grogans Mill Rd.
The Woodlands, Texas 77380
Telephone 713-364-6647
Facsimile 713-364-6632



December 13, 1993

Mr. David Henry
Manager of Environment, Health, & Safety
Amoco Production Company
P.O. Box 3092
Houston, TX 77253

Re: Transfer of Burton Flats Plant Discharge Plan GW-13 from Trident NGL, Inc. to Amoco Production Company

Dear Mr. Henry:

As you are aware, Trident NGL, Inc. sold the subject facility to Amoco Production Company in March, 1993. Attached are copies of the latest facility Discharge Plan submitted in January, 1989 and a letter approving the plan issued by the Oil Conservation Division in March, 1989. Trident has previously made Amoco aware of the existence of the plan and provided a copy thereof to Amoco.

Trident requests that Amoco make any necessary filings to accept transfer of the plan. A copy of this letter without attachments will also be sent to the New Mexico Oil Conservation Division.

Please feel free to contact me if you need further information on this matter.

Sincerely,

A handwritten signature in cursive script that reads 'Robert J. Cinq-Mars'.

Robert J. Cinq-Mars
Environmental Manager

cc. Mr. Roger Anderson, New Mexico Oil Conservation Division
Mr. Fred Jones
File 3089.54



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

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

July 15, 1993

CERTIFIED MAIL
RETURN RECEIPT NO. P-111-334-226

Mr. Scott Newman
Amoco Production Company
P.O. Box 3092
Houston, Texas 77253-3092

**RE: Discharge Plan GW-13
Burton Flats Gas Processing Plant
Eddy County, New Mexico**

Dear Mr. Newman:

On February 20, 1984, the original groundwater discharge plan, GW-13 for the Burton Flats Gas Processing Plant located in the SE/4, SW/4 of Section 14, Township 20 South, Range 28 East, NMPM, Eddy 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 discharge plan was renewed February 20, 1989. The approval will expire on February 20, 1994.

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. Scott Newman
July 15, 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,



Roger C. Anderson
Environmental Bureau Chief

RCA.cee

xc: OCD Hobbs Office



OIL CONSERVATION DIVISION
RECEIVED

'91 SEP 3 AM 9 11

OXY USA INC.

Box 50250, Midland, TX 79710

August 26, 1991

Mr. Roger Anderson
Energy, Minerals and Natural Resources Dept.
Oil Conversation Division
P. O. Box 2088
Sante Fe, New Mexico 87504

Re: Transfer of Discharge Plans GW-18 and GW-13

Dear Mr. Anderson:

Attached is a copy of the notification of transfer as required by the Oil Conversation Division. Also is the receipt showing the transfer was received.

Occidental Oil and Gas Co. is in the process of selling its domestic gas processing division, which includes the two plants associated with these discharge plans, to Trident NGL Inc. a new company owned by Occidental and Hicks, Muse and Co. At present the new company is in the process of being formed, and an operating staff has not been named. Closing is expected prior to September 1, 1991; however I don't know how long if at all OXY will operate the facilities during an interim period.

If there are any questions please advise at 915 685 5836.

Sincerely,

Keith Brown
OXY USA, Inc.



OXY USA INC.

Box 50250, Midland, TX 79710

August 17, 1991

Mr. Mike Neumann
President, Chief Operating Officer
Trident NGL, Inc.
1980 Post Oak Blvd.-POC II, 77056
Houston, Texas

Re: Transfer of Bluit and Burton Flats Discharge Plans

Dear Mike:

This letter is to inform a representative of Trident NGL, Inc. that the Burton Flats and Bluit gas processing plants have ground water discharge plans (GW 18 and GW 13 respectively) required and approved by the state of New Mexico which become the responsibility of Trident NGL, Inc. effective upon closing.

As required by the New Mexico regulations WQCC 82-1, 3-111 a copy of this notification, along with the return receipt designating proof notification was received, is being sent to the director of the New Mexico Oil Conservation Division.

Per the above regulations, "Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge plan, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the division's file or files concerning such discharge plan." Immediately after the remainder of the Trident organization is announced, I will forward copies of the discharge plans, along with a copy of this letter to the appropriate level of operations management.

Sincerely,

A handwritten signature in black ink, appearing to read "Keith Brown", with a long horizontal flourish extending to the right.

Keith Brown
OXY USA, Inc.

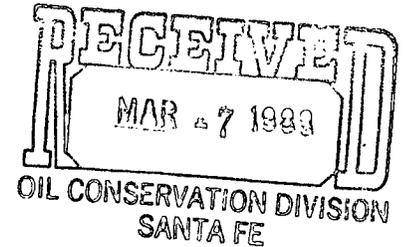
cc: Hans Schuster



UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
Ecological Services

Suite D, 3530 Pan American Highway, NE
Albuquerque, New Mexico 87107

March 3, 1989



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

Dear Mr. Lemay:

This responds to the public notice for proposed discharge plans submitted to your division. We have reviewed the following plans and have identified issues of concern to our agency.

GW-13, OXY-NGL Inc. Burton Flats Gas Processing Plant.

Any wastewater on site should be covered or screened so that migratory birds do not have access to the wastewater, especially if a layer of oil or gas is present. If migratory birds should come in contact with this water and perish, it is a violation of the Migratory Bird Treaty Act. Corporations or individuals responsible may be fined up to \$10,000 per count.

These comments represent the views of the Fish and Wildlife Service. Thank you for the opportunity to review and comment on the proposed plans. If you have any questions concerning our comments, please contact Tom O'Brien or Richard Roy at (505) 883-7877 or FTS 474-7877, or Tom Lane of Law Enforcement at (505) 883-7814.

Sincerely yours,

Michael J. Donahoo
Acting Field Supervisor

cc:

Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico
Regional Administrator, Environmental Protection Agency, Attn: Kathy Hollar,
Office of Ground Water, Dallas, Texas
Regional Director, U.S. Fish and Wildlife Service, Fish and Wildlife
Enhancement and Law Enforcement, Albuquerque, New Mexico

Affidavit of Publication

Copy of Publication

No. 12668

STATE OF NEW MEXICO,
County of Eddy:

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

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

First Publication February 24, 1989

Second Publication

Third Publication

Fourth Publication

and that payment therefore in the amount of \$ has been made.

Subscribed and sworn to before me this 24th day of February, 1989.

Barbara Ann Beers
Notary Public, Eddy County, New Mexico

My Commission expires September 23, 1991.

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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-13) OXY NGL Inc., Burton Flats Gas Processing Plant, H. Schuster, Manager, Region 1, P.O. Box 300, Tulsa, Oklahoma, 74102, has submitted an application for renewal of its previously approved discharge plan for its Burton Flats Gas Processing Plant located in the SE 4, SW 4, Sections 14, Township 20 South, Range 28 East, NMPM, Eddy County, New Mexico. There are no continuous flows of wastewater from any plant processes. Any planned wastewater generated is collected in on-site storage tanks and disposed of at an OCD approved off-site disposal facility. Ground water most likely to be affected by any discharge at the surface is at a depth of approximately 140 feet with a total dissolved concentration of approximately 3000 mg/l. The discharge plan addresses how spills, leaks and other discharges to the ground will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least 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 interest 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 15th day of February. To be published on or before March 1, 1989.

STATE OF NEW MEXICO
 OIL CONSERVATION DIVISION
 WILLIAM J. LEMAY, Director
 Journal, February 22, 1989

STATE OF NEW MEXICO } SS
 County of Bernalillo }
THOMAS J. SMITHSON

..... being duly sworn declares and

says that he is **NAT'L ADV. MGR.** of the Albuquerque Journal, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made or assessed as court costs; that the notice, a copy of which is hereto attached, was published in said paper in the regular daily edition,

for 1 times, the first publication being on the 22 day
 of Feb , 1989 , and the subsequent consecutive
 publications on , 1989

OFFICIAL SEAL
 ANGELA M. ARCHIBUQUE
 Notary Public New Mexico
 Expires 4/30/92

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 22 day of Feb, 1989.

PRICE \$22.17

Statement to come at end of month.

ACCOUNT NUMBER C80932

Notes of Boyer - Q 495

12/1/68 Burlington State - OXLY
- 306 Cong-Mans Canal

Walters, Gary & Dick
Gas Blows Vent - N Side
A compressed gas pack - oil drops
to ground (leak house vent)
To pack oil & water curbed
* 3

✓ 3 Burned blow-out
(leak thru tank)
repaired pack oil &
water - blowing to
slat oil tank - no leak
detectors. Inspect
tank with 5/8 inch lead
detector & removed

✓ F Purged & removed
tracing unit - they
saw when still - more
concrete inspection when
little oil leaking

✓ 5 Same procedure
as above

✓ 6 Down stream has
no pack.

✓ 7 Pond sample lining - 34 ft
of Hypalon - OK if
inspected properly put on the pulley
seal would be in when in use
could empty before gets higher than 2-3
when empty

✓ 8 Sealment Tank washed -
has "mummers" spirits

✓ 9 Slat oil tank lined
as in lake on 9 pumps
oil & cover part.

✓ 10 Find (oil) Ducta 507
rite - BUN or Jones
wife.

ABD Plant - Shut Down

996 551 1880 FUL - 35 - 175-225

1 Fluids contained
X - time after start
up on computer pads

2 Blows could repairs tested
prior to start up. Leak repair -
2. leak detection tank replaced



OXY NGL INC.
Box 300, Tulsa, OK 74102

February 7, 1989

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

Dear Mr. Boyer:

Subject: Discharge plan GW-13 Burton Flats Gas Processing Plant
Eddy County of New Mexico

Enclosed are three copies of the revised Discharge Plan GW-13 for the Burton Flats Gas Processing Plant. This revision is submitted for purposes of renewal of the subject plan.

The Burton Flats site is currently operating as a compressor station only and there are no current plans to begin extraction of natural gas liquids from the inlet gas in the near future. Other than fugitive leaks from the compressor area which are addressed in the revision no possible discharge of any materials is occurring on site. Inlet fluids including products, waste water, and other fluids from the compressor area are hauled off site.

Please contact the undersigned by collect phone call to (918) 561-8411 if I can answer any questions you may have on this matter.

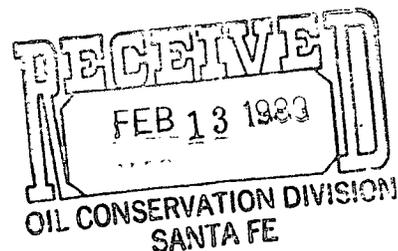
Very truly yours,

R. J. Cinq-Mars
Environmental Compliance Manager

RJC/rlo

Enclosure

cc: D. Kemp
B. Malek
C. Mattoon - West Seminole Plant
H. Schuster
File ENV-BURTON FLATS-PLANS-DISCHARGE



L2/186

OXY NGL Inc.
Burton Flats
Gas Processing Plant
Discharge Plan
Section 14, Township 20 South, Range 28 East, NMPM,
Eddy County, New Mexico

Submitted to:

New Mexico Oil Conservation Division
Sante Fe, New Mexico

Prepared by:

OXY NGL Inc.
P.O. Box 300
Tulsa, OK 74102

January, 1989

Official Contact: Manager, Region I - H. Schuster
(918) 561-2618

Technical Contact: Environmental Compliance Manager - R. J. Cinq-Mars
(918) 561-8411

Local Contact: Plant Manager - C. Mattoon
(915) 758-9851



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Affirmation

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

H. Schuster

2/10/89

(Signature)

(Date)

H. Schuster

Manager, Region I

(Printed Name of Person

(Title)

Signing)

I. Introduction

This report is submitted in accordance with Section 3-106 of the New Mexico Water Quality Control Commission Regulations as required by the New Mexico Oil Conservation Division and includes a plan of containment for wastewater and materials associated with the operation of the OXY NGL Inc. Burton Flats Gas Processing Plant.

II. History and Background of the Plant

In the summer of 1976, Cities Service Company, predecessor to OXY NGL Inc., began consideration of a gas processing plant in the North Burton Flats area of Eddy County, New Mexico, based on the possibility of an enhanced recovery project in the Wolfcamp reservoir. Analysis of gas from the Wolfcamp and Atoka formations, along with facilities cost studies, led to the decision to construct gathering, processing, and delivery facilities in the area. It was decided that a skid-mounted cryogenic plant unattended 16 hours per day would be the optimal operation. This type of operation has negligible wastewater quantities with no cooling tower or boilers. Also, no flare was required because of the composition of the inlet raw gas. The plant was completed and put into operation in the fall of 1977 with a design capacity of 7.5 million cubic feet per day.

Between March, 1986 and December, 1987, the plant operated as a compressor station only. No natural gas liquids were extracted. The plant did extract natural gas liquids from January 1 to October 31, 1988. From November 1, 1988 to the present, the plant has again operated as a compressor station only. Gas processed averaged only approximately 2.2 million cubic feet per day for the 10-month period of liquids extraction in 1988.

As of the date of this submission, there are no plans to begin liquid extraction in the near future.

III. Environmental Description

Geology

The plant is located in the Pecos River Valley on the shelf of the buried Capitan Reef Front which goes through the city of Carlsbad. Figure 3.0 shows the generalized geology of the Eddy County area. Gypsiferous rocks of the Permian System underlie the Burton Flats plains. The Permian System is the oldest of the geologic systems in the Eddy County. The gypsiferous group includes the Rustler, Castile, Tansill and undifferentiated rocks of the Guadalupe Group. Of the underlying carbonatic rock formations, the Capitan consists of fossiliferous, calcitic limestone. The Dewey Lake Redbeds lie above and gypsum land is a representative land type. Figure 3.1 is a composite cross-section of Eddy County indicating the various units.

The Tertiary System is found northeast of Loco Hills where the Ogallala formation is prominently exposed in the Mescalero Escarpment. This escarpment is generally considered to be the zero line of saturated thickness and the well known Ogallala aquifer lies to the northeast with a thickness of up to 200 feet in the Lovington area.

Climate

Typical of the Southeastern plains of New Mexico, the Eddy County area has a semiarid, continental climate. There is abundant

sunshine, erratic rainfall, low relative humidity and a wide deviation in daily and seasonal temperatures. Winters are short and moderate while summers are long and hot. The average annual rainfall is 12 inches with most of the precipitation falling in summer. Brief, heavy thunderstorms occur frequently in June through August, and as many as forty can occur in a year. There is measurable rainfall 42 days per year, average. Evaporation is immense and most of it generally coincides with the months of the highest rainfall, May through October. It ranges from 100 to 110 inches per year from a Class A measuring pan and lake evaporation averages 69 inches.

The prevailing winds are from the southeast, but they generally shift to southwesterly in winter. Windspeeds range from an average of 10 miles per hour in September to 16 miles per hour in March.

Hydrogeology

With the general absence of the Tertiary System and the Ogallala Formation, there is little ground water of much importance in the northeast Eddy County area. Again, Figure 3.1 indicates the lack of good yielding water bearing formations. Figure 3.2 from the U.S. Soil Conservation Service Soil Survey for Eddy County illustrates the general soil association found in the plant vicinity. The Soil Conservation Service states, "there are few natural springs or seeps, and ground water is hard to locate" in this association. It further states that ground water "is of poor quality" in places where found.

Excerpts from a report done by Geohydrology Associates Inc. for the Bureau of Land Management dated June, 1978 indicates the supposed presence of a 171 foot deep water well in the SW NE NW Section 14, Township 20 South, Range 28 East, NMPM, Eddy County [20.28.14.123 in New Mexico Well Numbering System]. This location is apparently not correct since no surface equipment is visible at that location. There is water quality data on what appears to be one well in data obtained from the New Mexico State Engineering Office via the Oil Conservation Division and dated May 7, 1987 for location 20S.28E.13211.

OXY personnel have verified that there was a facility owned currently by Collier Oil Company on the west edge of Section 13 approximately 0.5 miles east and 0.25 miles north of OXY's plant site. Until approximately 1987, there was an occupied house on this site. The domestic well shown at location 20S.28E.13211 is at this site. The house was subsequently destroyed in a fire and there are no personnel or building on this site at this time. OXY personnel have further verified that electrical connections have been removed and the pump pulled from the well.

Well data from the above quoted sources are included in the Appendices to this Discharge Plan attached hereto.

However, the lack of ground water in the area of any predictable quantity and quality was so well established that Cities Service Company, at the time of the plant's construction, did not seek to find any, and no test holes were put down on site or in the vicinity.

Surface Hydrology

Most all of Eddy County is in the Pecos River drainage basin. The general soils in the plant vicinity are given by the U.S. Soil Conservation Service as the "Reeves - Gypsum land - Cottonwood Association." This is characterized by "loamy soils that are very shallow to moderately deep over Gypsum beds and Gypsum land." There is little or no surface water in these areas except after a rain for short periods of time. Ranches cover many square miles because of the lack of water and sparse vegetation.

The specific soil on the plant site is Gypsum land - Reeves complex (GR) while a similar soil, Reeves - Gypsum land complex (RG), lies in close proximity to the west, as can be seen in Figure 3.3. Both of these soils are relatively flat with 0 to 3 percent slopes. The SCS says the GR soil is "very droughty" with a "low to very low" water-holding capacity. Permeability is rapid in the surface layer of the soils and the low sand dunes. As seen on the plot plan of the plant, there is only 2.5 to 3 feet of elevation change across the site. Therefore, very little runoff would be expected from the plant site during anything but the heaviest possible rainfall event.

IV. Water Quality

Since there are only intermittent watercourses in the area which are normally dry and only a very few of them at that, surface water quality is indeterminate. The nearest well, as indicated by the New Mexico State Engineers office as location, 20S.28E.13.13211 discussed above, showed chloride levels at 608 and 671 mg for two samples from what is apparently the same well in 1969 and 1976 respectively. This well is no longer in service as discussed above.

V. Plant Description and Operation

Location

The plant is located in Eddy County about 10 miles northeast of the City of Carlsbad in an area known as Burton Flat as seen in Figure 5.0. The site is relatively flat. The legal description of the site is as follows:

A tract of land containing 8.26 acres, more or less, being a certain part of the South Half of Section 14, Township 20 South, Range 28 East, N.M.P.M., Eddy County, New Mexico and is more particularly described as follows:

Beginning at a point bearing north $3^{\circ}44'$ east a distance of 732.10 feet from the south quarter corner of the said Section 14; thence, south $89^{\circ}54'$ west a distance of 600 feet; thence, north $0^{\circ}03'$ east a distance of 600 feet; thence, north $89^{\circ}54'$ east a distance of 600 feet; thence south $0^{\circ}03'$ west a distance of 600 feet to the point of beginning.

The Plot Plan (Dwg No. 619-100-E1) in the Appendix shows the general plant layout.

Process Description and Schematic

Gas processing at the plant during its normal operations may be divided into separate functions: inlet facilities, dehydration, gas chilling, separation and product treating. At the time of this plan renewal (January, 1989) only the inlet facilities including the inlet separator and compressor are operating. Each function described below can be followed on the flow diagram, Figure 5.1.

1. Inlet Facilities:

Inlet facilities are provided to:

- A. Separate the vapor and liquid
- B. To compress the gas from 500 psig to 915 psig and cool the gas after compression to 120°F.

Inlet liquids are sent to the condensate/slop oil tank.

Approximately 500 barrels/year of inlet liquids consisting of approximately 90% condensate with the rest inlet water and waste water and oil from the compressor skid are produced.

2. Dehydration:

In order to avoid ice and hydrate formation in the low temperature portions of the plant, it is necessary to reduce the water content of the gas to an acceptable level. This is done in the dry bed desiccant dehydrator. Free liquids from this process are sent directly from filters on the process skid to the condensate/slop oil tank.

3. Gas Chilling:

Gas is fed from the dehydration system to the chilling portion of the plant at about 900 psig and 120°F. The inlet stream is cooled to -60°F by exchange with 5 different streams in the process heat exchangers. The gas is then fed to the turbo-expander where work is removed and the stream reduced in pressure to 275 psig and in temperature to -135°F. The resultant condensed natural gas liquids and remaining vapors are fed to the demethanizer.

4. Separation:

The demethanizer is a stripping column which separates the plant product from the residue gas. The product from the demethanizer is pumped to 480 psig, treated in a product amine treater and pumped to 1,000 psig before being delivered to the product pipeline. Residue gas leaves the top of the demethanizer

at 275 psig and -142°F. The stream is heated to about 105°F by exchanging heat with different streams.

The gas is then compressed to 304 psig and 128°F in the expander compressor. Final sales gas compression to 505 psig and 210°F is provided in the packaged compressor. Residue gas is then cooled to 120°F before being delivered to pipeline.

5. Product Treating:

The product amine treater removes carbon dioxide (CO₂) from the hydrocarbon liquid product stream by contacting the product with an aqueous diethanolamine (DEA) solution on the amine contactor skid. The aqueous DEA solution containing CO₂ is then re-generated on a separator skid utilizing stripping steam produced in a reboiler. The steam is recondensed and the CO₂ vapor is vented to atmosphere. No other waste products are normally generated during this process. Amine solutions are only wasted as the result of a process upset or other abnormal operating condition.

Cooling Water

There are no open system cooling requirements in this type of gas plant and therefore no cooling tower. There is also no boiler blowdown. There is one closed cooling system and that is the jacket water system on the Waukesha compressor. Because the plant is

unattended 16 hours per day, antifreeze (glycol) is used in the system. No corrosion inhibitors are used.

Water Supply

Since there are no wells on site, all water comes from off site. Makeup water for the compressor is hauled in by a Carlsbad company and is stored on site in the 100 barrel above-ground water storage tank. Drinking water is hauled in periodically by a commercial company in large bottles.

VI. Disposal Practices

There are no continuous wastewater flows from any of the plant processes and therefore no need for any surface discharges from the plant site. As noted previously, the purpose of the pond on site is to catch and contain possible overflows from the slop oil tank and upset flows and spills from the amine contactor and the amine regeneration skids. The pond, as seen in the northeast corner on the plot plan, is 55' x 55' at the top inside of the dike, and 10' deep. The slopes inside and outside are 1 to 1 and the lining is nylon reinforced neoprene. Factory fabricated "boots" seal the locations where the four inlet pipes come through the inside slope. One of the inlet pipes carries gaseous carbon dioxide to the pond from the product treater.

Sanitary sewage from the office goes to a septic tank - soil absorption system located on the property. With at most 2 employees on site each day there is no more than 64 gallon per day using USEPA figures of 32 gallons per employee per day.

The slop oil tank receives liquids from the plant inlet separator. This tank has a capacity of 100 bbl. and is pumped and currently hauled by Watson Treating, Box 75, Tatum, NM 88257, Telephone (505) 391-3490. It is regularly pumped when it reaches the two-thirds level leaving a safety factor of at least 4 weeks before it would become completely full. The liquids are made up of condensed

hydrocarbons, inlet water and waste water oil from the compressor skid. The tank has a 3 ft. high dike on all 4 sides to contain any tank leak.

There are no unusual or great amounts of solid waste generated on site. Besides the typical office waste, there is only spent dryer beads from the dehydrator which are handled in barrels and replaced about every 5 years and standard oil filters from the engine and compressors. The filters are air dried and disposed with other trash in a dumpster. The dumpster is hauled by Waste Control of New Mexico to the Carlsbad City land fill.

There are several locations associated primarily with pumps and the stationary engine driven compressor where inadvertent leaks can result in possible discharges to the surface of the ground. These possible discharges consist of oil leaks or amine leaks. Control technologies proposed for these locations as required by Messrs. David Boyer and Roger Anderson of the Oil Conservation Division Energy, Minerals and Natural Resources Department, State of New Mexico are discussed in the next section.

VII. Containment Plan ("Discharge Plan")

Disposal Methods

The current method and procedures for waste liquid containment and disposal at Burton Flats will continue. The slop oil tank will continue to be emptied well in advance of need and the contents taken by a contract hauler in compliance with the applicable state and federal regulations and disposed of or recycled. Procedures at the plant will continue to minimize conditions which would result in an overflow from this tank into the lined pond. When the facility is operating as a compressor station without liquids extraction, this is the only potentially active line connected to the pits.

The drains from the amine contactor and amine regeneration skid will remain connected to the pond. Discharges from these units will continue to be only for abnormal conditions and in discreet amounts. If any change in the method of operation of this pond occurs which results in continuous use of the pond, OXY will immediately notify the Oil Conservation Division.

The pond is normally kept empty and dry. In no case will it be allowed to have a freeboard of less than 3 feet. The pond will be pumped by the contract hauler for the slop oil tank or an equally capable and approved contractor. Continual efforts will be made by plant personnel to keep tumbleweeds, debris and other extraneous material out of the pond. For these reasons, OXY believes that the single liner is adequate to protect ground water.

Contingency

Power failures at the plant occur no more than once per week on an annual average with most bunched up in the spring. These normally last only minutes with the longest being no more than a couple of hours. However, when the power goes off and the plant goes down, feedstock gas bypasses the plant. Therefore, there can be no wastes generated during a failure and a power failure represents no special environmental problem.

There is little probability of flash flooding at the Burton Flats Plants. The flatness and higher elevation of the terrain, the high permeability of the Gypsum-Reeves soil, and a 100-yr. 6-hr. rainfall event of less than 4.2 inches all add up to very little probability for the pond dikes (over 2 ft. high) to be overtopped by runoff water. Plant personnel recall no more than 2-3 inches of water on the plant site in a hard downpour.

The containment pond on site is a contingency pond. It is available to receive most all plant liquids which do not readily evaporate for all plant upsets of any consequence whether they come from natural catastrophes or processing malfunction. If the contract hauler cannot pump the pond should the level become critical, there will be no problem in obtaining a backup since there is quite a lot of gas and oil field activity in the area.

Inspection and Reporting

Each year the pond is emptied, if not already so, cleaned and inspected. The liner is examined for rips, holes, cracks, compromised seals or anything which would allow liquid to pass through the liner. Any leaks will be repaired in a professional manner before putting the pond back into service. Before the current liner reaches the end of its useful life, it will be replaced with a liner of equal or better quality. The current liner was installed in 1985.

All spills of hazardous materials occurring on the plant site that are not caught by the containment pond will be reported to the Oil Conservation Division. Any instance where the pond would overflow or where there would be a significant leak through the liner would be reported also.

Minor Leaks or Releases - Control

There are several locations on the plant site where the potential for surface contamination existed as of December 1, 1988. They are listed below, along with dates by which OXY has or commits to provide impervious containment or take other action:

1. Product Pumps - 55 gallon drums used to contain packing leaks. These have been removed. Prior to initiating NGL extraction, OXY commits to tying these packing drains into either the existing blow case or to provide some other type of above ground drip pan.
2. Amine Skid - OXY commits to installation of a drip pan or other containment device at the pump area on the amine skid prior to reinitiating product treating.
3. Engine Driven Compressor Skid - OXY will install curbing to prevent runoff from the compressor skid area by July 1, 1989.
4. Drum Storage - OXY will provide a concrete dike and pad for drum storage at the site by July 1, 1989.
5. Air Starter Vent Pipe - OXY will provide an above ground fabricated knockout pot to eliminate oil carryover from the air starter vent pipe by July 1, 1989.
6. Solvent Tank - OXY will move the solvent tank into the diked area when the tank is empty. This is expected to be before July 1, 1990.
7. Blow Cases - OXY has already initiated a monthly pressure test of the two in ground blowcases near the plant's compressor skid.

Plan Summary

1. All plant wastewaters which may occur are collected in tankage or a lined pond which will prevent any discharge from the plant property; all liquid waste is contained in the tankage or lined pond.
2. The pond is inspected daily during the regular 5-day workweek. A minimum of 3' freeboard will be maintained in the pond at all times. If severe storms or other abnormal events threaten to cause a pond overflow, vacuum trucks can be employed to haul off the contents to an approved disposal site.
3. The pond will continue to be emptied completely on an annual basis, cleaned and the liner inspected. Any necessary repairs will be made promptly.
4. The slop oil tank is emptied well in advance of need to preclude overflows and contents properly disposed of.
5. Drummed chemicals are kept stored in an upright position to preclude any dripping or tap accidents and will be placed on an impervious diked storage pad by July 1, 1989.

6. The solvent tank will be moved inside existing tank dikes when empty. This is expected to be by July 1, 1990.

7. The two blow cases near the facility compressor are pressure tested on a monthly basis and records will be kept for at least three years.

8. Diking or curbing or metal drip pans or knockouts will be installed on currently operating equipment by July 1, 1989 and on non-operating equipment prior to reinitiation of liquids extraction.

VIII. Conclusions

The Burton Flats Plant's cryogenic process allows it to operate without continuous wastewater streams. There is no sulfur in the feedstock gas to deal with.

By all information and data available, there is no appreciable ground water under the Burton Flats Plant or in the general vicinity. However, without conclusive data in the form of dry holes in the immediate plant vicinity, we look past Section 3-109C.1 to Section 3-109C.3.b(1) of the Water Quality Regulations for alternative approval requirements. The first requirement is that an impoundment not have more than 0.5 acre-feet per acre-year enter the subsurface for plan approval. With Burton Flats' 0.069 acre pond, this equates to 0.035 ac-ft/yr or 950 gal/mo. The typical circumstance is that zero gallons would enter the pond each month and therefore, zero gallons would enter the subsurface. But even if two month's contents, approximately 3300 gallons, from the slop tank overflowed, it would take considerable sized openings in the liner for 950 gallons of this to pass through to the subsurface. With the liner completely intact, only 2.3 gal/mo. would be allowed through (using manufacturer's data). This, coupled with the fact that in practice the pond is normally empty and dry, it can be seen that the

possibility of 950 gal/mo. reaching the subsurface is extremely remote. The second and third paragraphs under the same subsection do not have to be satisfied as long as the first is.

In view of these factors, the Burton Flats operation should not be considered as having any significant potential for liquid waste reaching the subsurface, and it certainly constitutes no more than the remotest threat to the closest groundwater.

IX. Figures

FIGURE 3.0
SOIL SURVEY

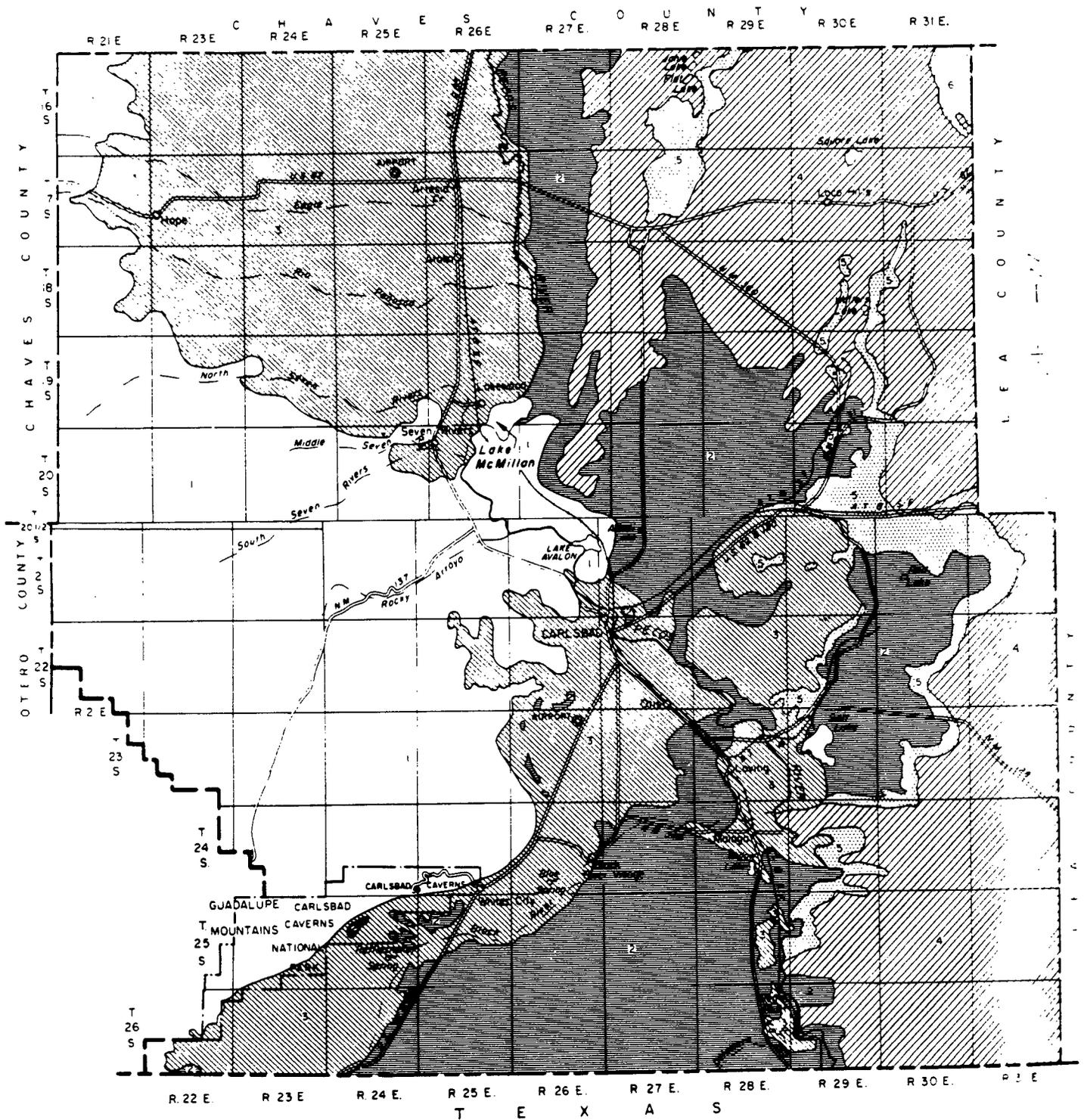


Figure 19.—Generalized geologic map of the Eddy Area, New Mexico:

1. Rocks of Permian age, primarily carbonatic.
2. Rocks of Permian age, primarily gypsiferous.
3. Loamy deposits of Quaternary age.
4. Sandy deposits of Quaternary age.
5. Rocks of Triassic age.
6. Rocks of Tertiary age.

Figure 3.1

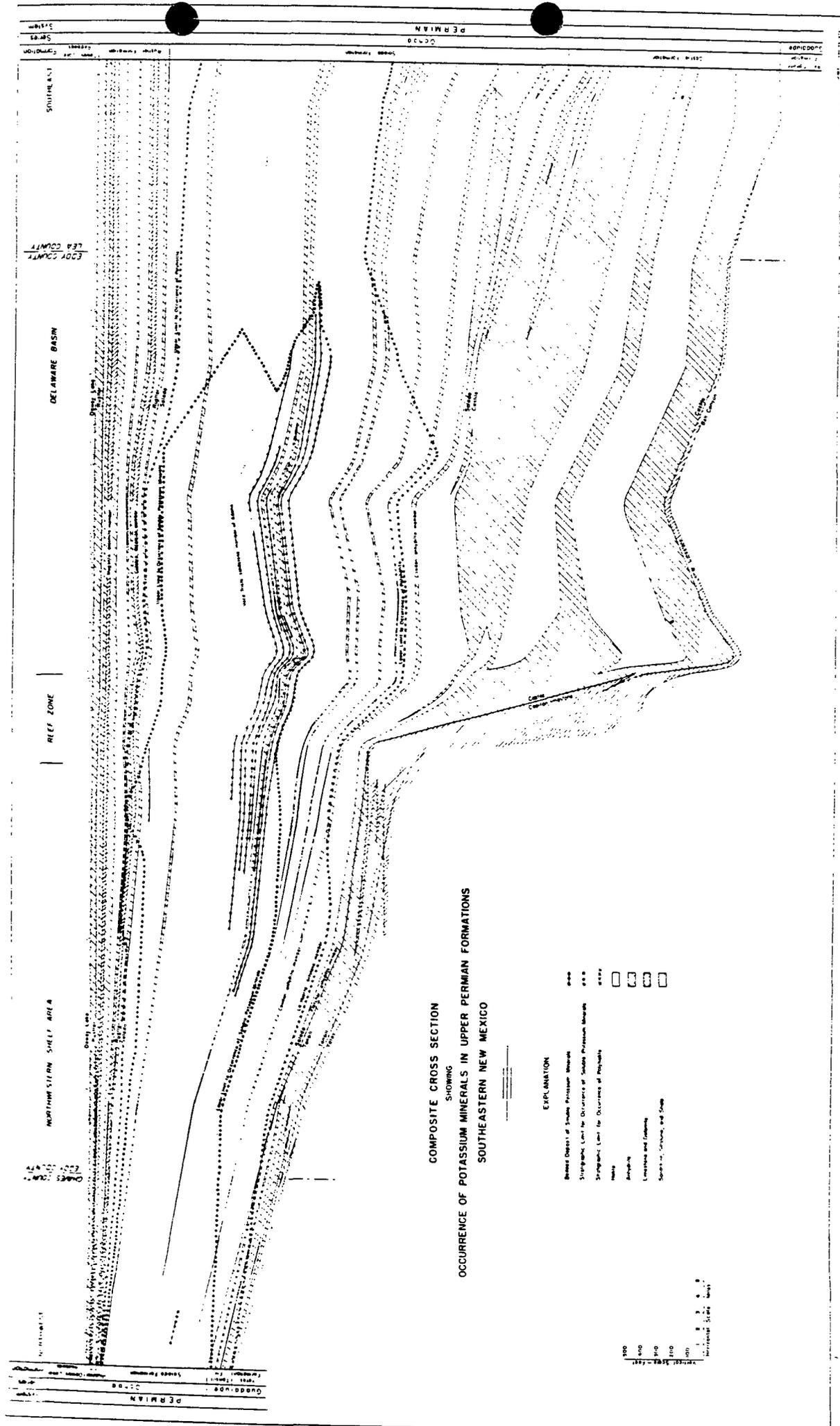


FIGURE 3.2
EDDY AREA, NEW MEXICO

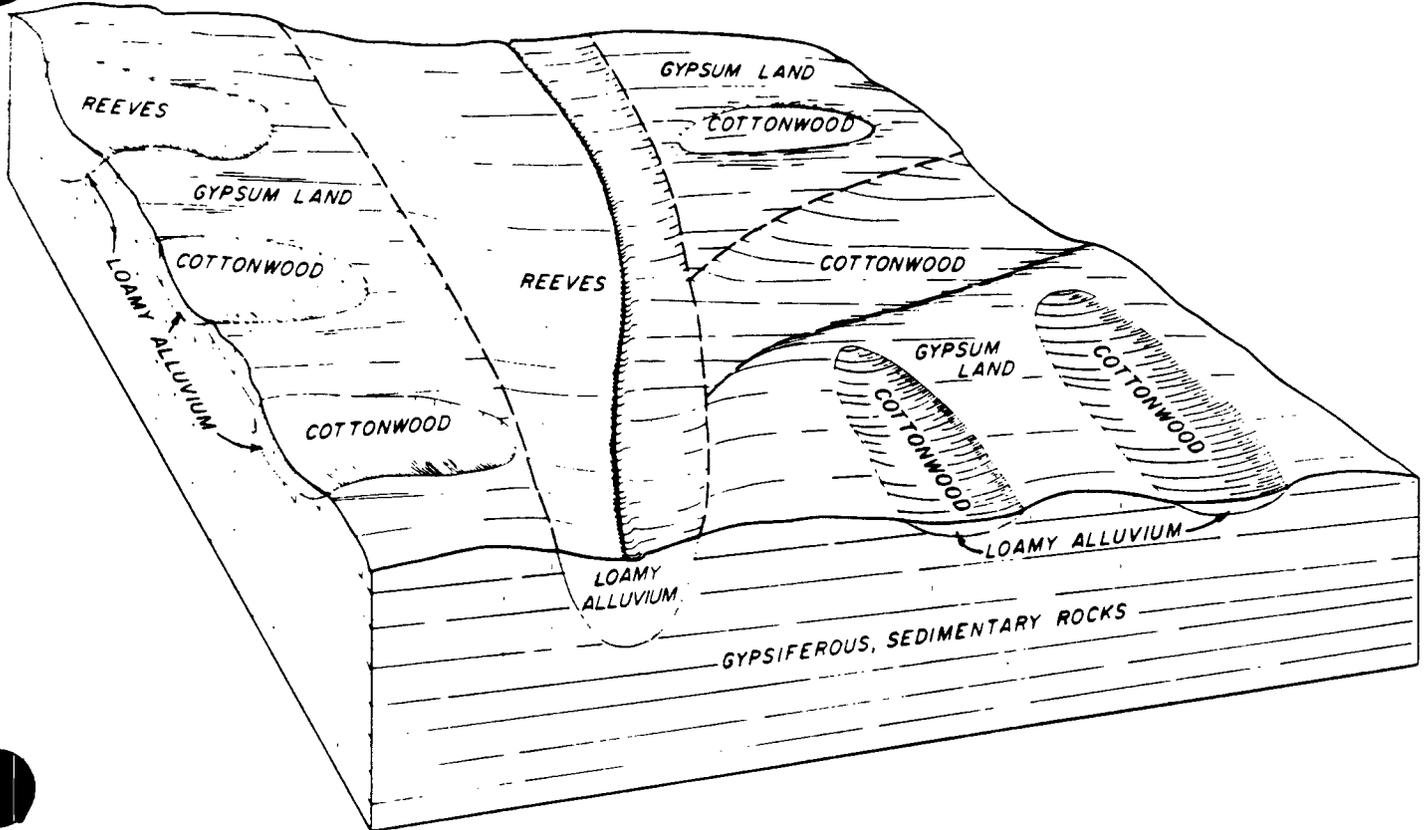
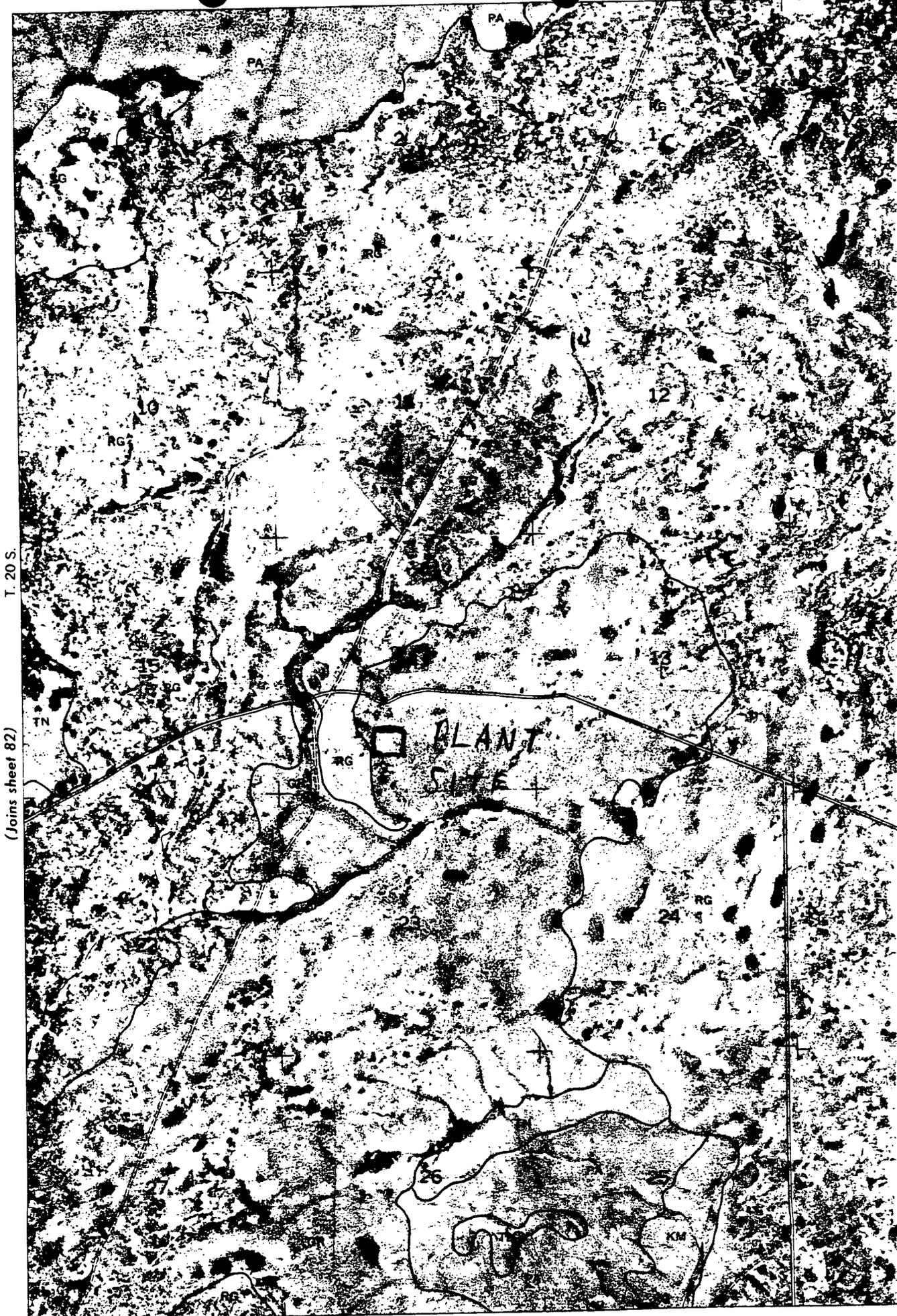


Figure 5.—Typical pattern of soils and Gypsum land in association 3.



T. 20 S.

(Joins sheet 82)

PLANT SITE

PA

PA

RG

RG

RG

RG

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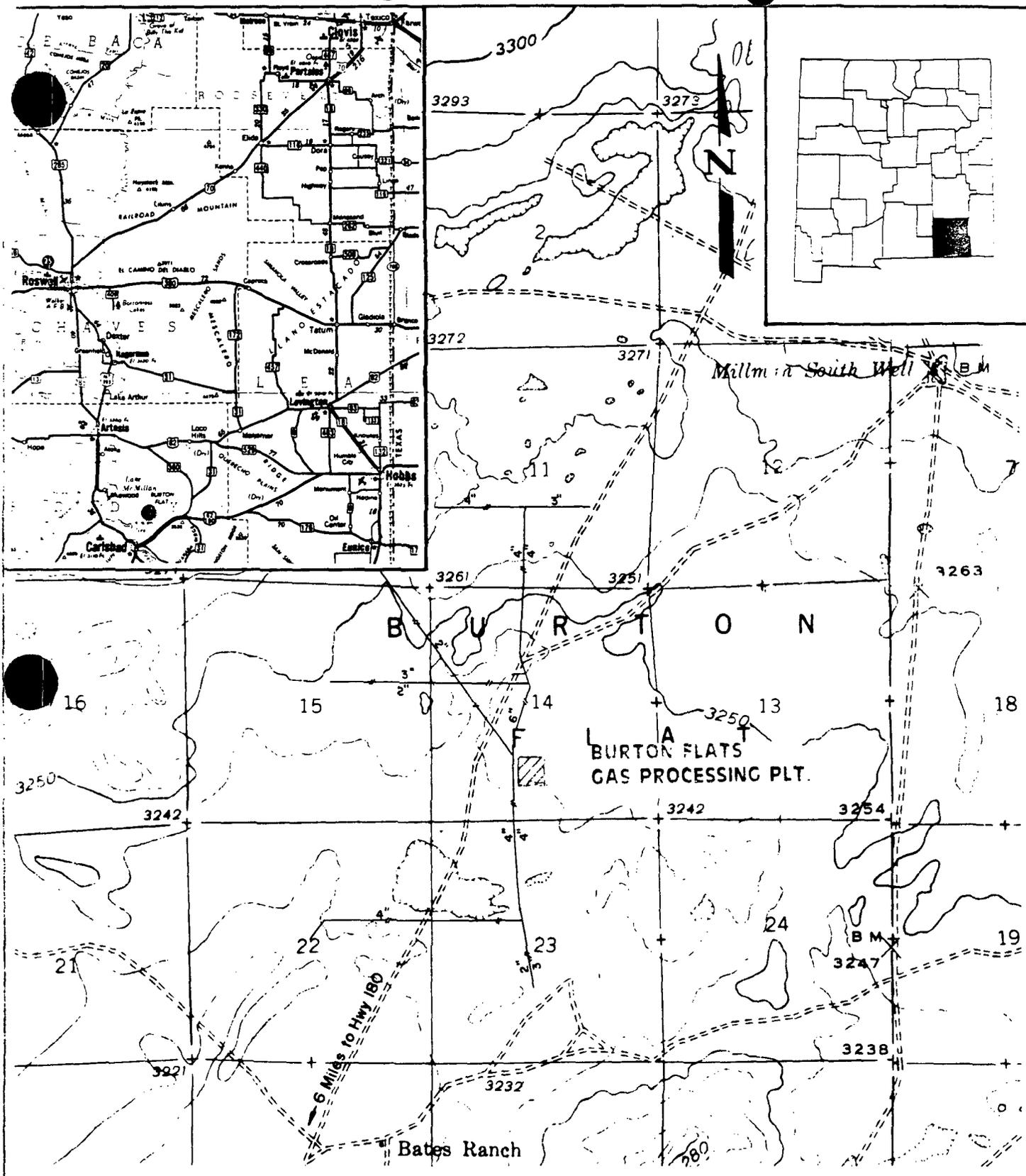
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FIGURE 5.0



NATURAL GAS LIQUIDS

OXY NGL INC.
 TULSA, OKLAHOMA

TULSA, OKLAHOMA

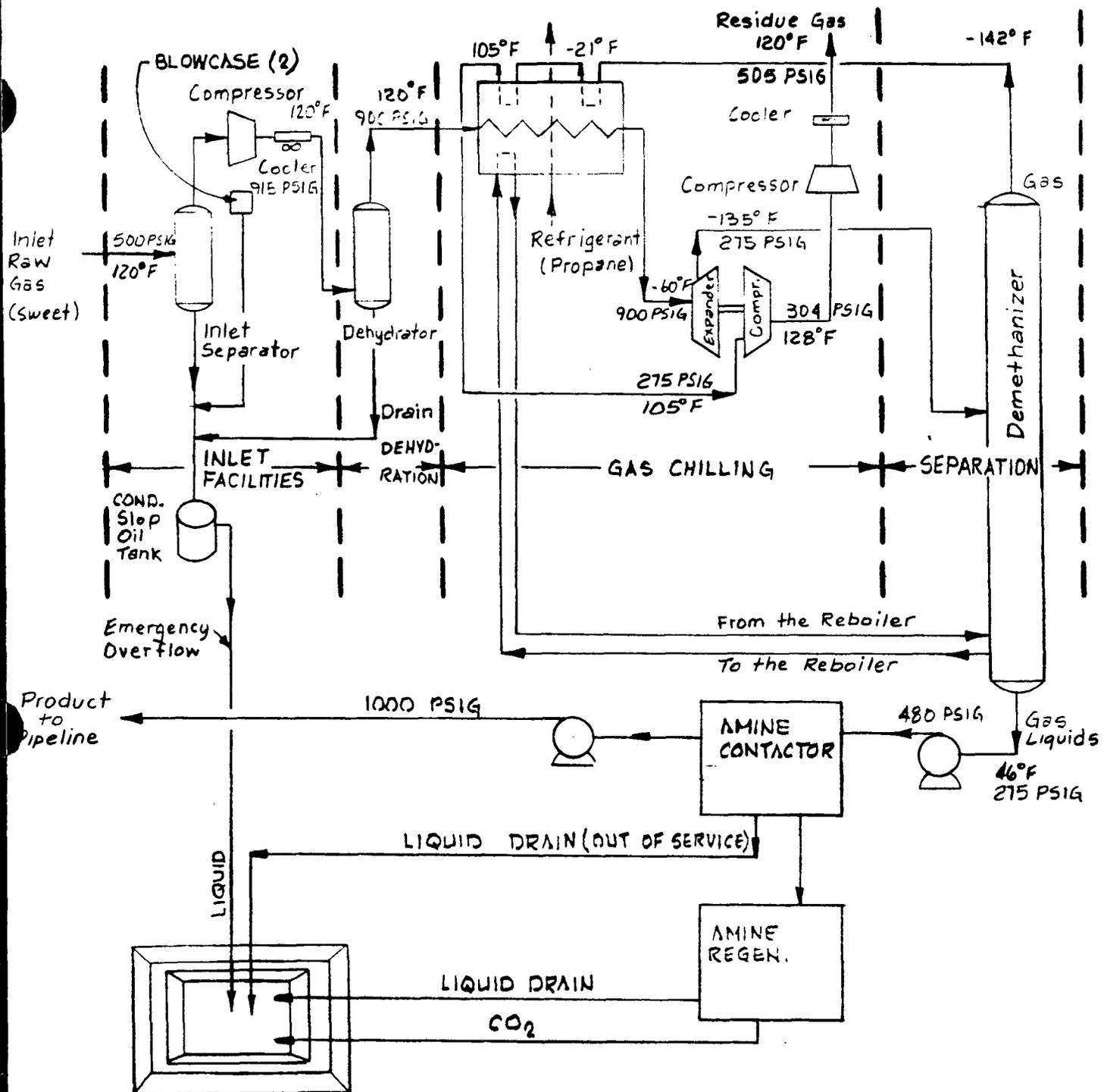
BURTON FLATS GAS PROCESSING PLT.
 EDDY COUNTY, NEW MEXICO

SCALE

DATE

1" = 3000'

FIGURE 5.1



Overflow and Spill Containment Pond

REV	DATE	SCALE	UTS	DATE
1	2.2.89	DRAWN BY	LJS	9/82
		INITIAL CK.		
		FINAL CK.	D.S.	9/82
		ENGR.		
		APPROVED		
		P.E. NO.		

CITIES SERVICE COMPANY

BURTON FLATS PLANT

GEN. ENGR. DEPT. TULSA, OKLA.

TITLE PROCESS FLOW WITH LIQUID WASTE CONNECTIONS

DWG. NO. 619-101-A

REV. 1

X.

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8. Tuan, Y., C. E. Everard, J. G. Widdison, and I. Bennett, The Climate of New Mexico, State Planning Office, Santa Fe, NM, 1973.
9. Weeks, J. B., E. D. Gutentag, Bedrock Geology, Altitude of Base, and 1980 Saturated Thickness of the High Plains Aquifer in Parts of Colorado, Kansas, Nebraska, New Mexico, Oklahoma, South Dakota, Texas, and Wyoming, Hydrologic Investigations Atlas HA-648, U.S. Geological Survey, Reston, VA, 1981.

XI. Appendix

COLLECTION OF HYDROLOGIC DATA
EASTSIDE ROSWELL RANGE EIS AREA
NEW MEXICO

by
GEOHYDROLOGY ASSOCIATES, INC.
Albuquerque, New Mexico

for
BUREAU OF LAND MANAGEMENT
Denver, Colorado

Contract No. YA-512-CT7-217

June 1978

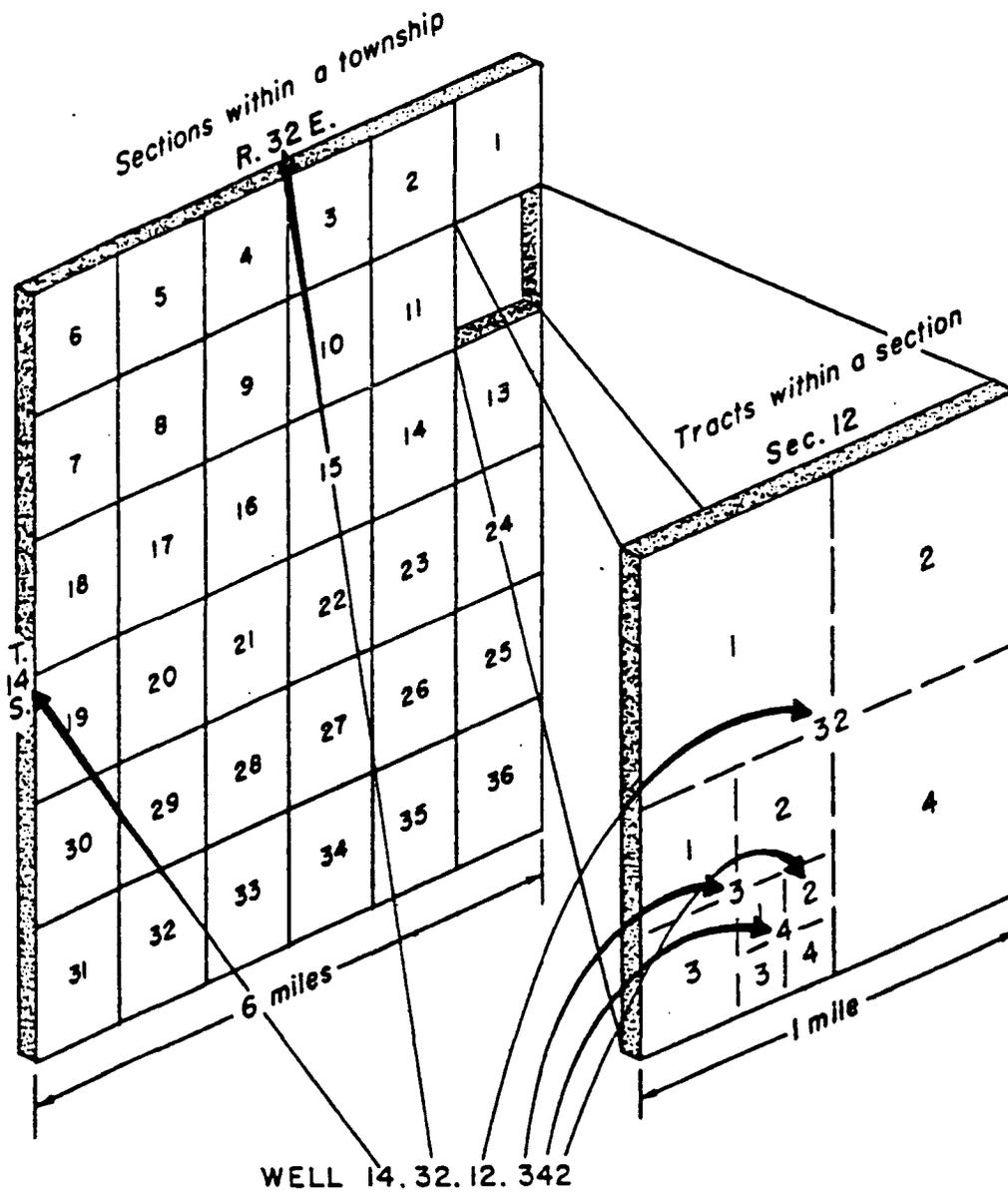


Figure 1.--System of numbering wells in New Mexico.

EXPLANATIONS FOR USE IN RECORDS OF WELLS, APPENDIX A

- Location : See Introduction for explanation of well-numbering system.
- Depth of well and Depth to Water : Reported depths are given to nearest foot; measured depths are given to nearest tenth or hundredth of a foot.
- Aquifer : Qtal=Quaternary; Ogl1=Ogallala; Trsc=Triassic; Rslr=Rustler; Clbd=Carlsbad; Ckbf=Chalk bluff; Dckm=Dockum; Vf1l=Valley fill; Trcl=Tertiary; Cplm=Capitan lime; Tns1=Tansill; Rbsa=Roswell Basin Shallow Aquifer; Salm=San Andres Limestone; Gsam=Glorieta-San Andres Limestone; Sadr=San Andres Limestone of Manzano.
- Remarks : S.C.=Specific Conductance; est.=estimated; gpm=gallons per minute.

Records of wells from Eddy County, New Mexico

Location	Well Status	Altitude (feet)	Depth of Well(ft.)	Depth to Water(ft.)	Aquifer	Date of Measurement	Remarks
16.27.27.133	Domestic		180	70	Qtal ?	Apr., 1963	
27.331	Irrigation	3493	1070	27	Ckbf	Jan., 1963	
36.212	Stock	3454	61.4	47.1	Ckbf	Oct.13,1977	S.C.>8000;17°C
16.28. 3.210	Stock	3576	30.0	8.17		Oct.14,1977	S.C.4600;17°C
12.212	Stock	3579	49.8	47.22		Oct.14,1977	S.C.4100;21°C
16.30.24.122	Stock	3828	380.1	330.69		Oct.17,1977	S.C.1560;21°C
16.31. 2.122	Stock		320	290+		Dec.9,1948	
2.12124	Stock/Domestic	4116		304.618	Ogll ?	Mar.30,1971	
14.24444	Stock	4396		297.40	Ogll	Mar.30,1971	
14.300	Stock			113.4	Dckm ?	Dec.9,1948	
22.44414	Stock	4250	167	153.40	Ogll	Mar.30,1971	
23.443	Stock	4240	161.8	155.02			
17.27. 3.120	Aband. Stock			130+	Ckbf	Dec.1,1948	
5.444		3354	80	30		Oct.16,1952	
11.110	Stock			18.1	Ckbf ?	Dec.1,1948	
12.413	Irrigation	3472	250	115		Apr., 1954	
16.344	Domestic		1042	260		Jan., 1960	
16.344	Domestic	3435		182.36		Jan.18,1966	
16.344	Domestic	3260	1220	175		Mar.15,1960	
17.4	Domestic	3386	300	90			
18.234	Domestic	3312	138	111	Qtal	Feb,1963	
32.313		3420		78.16		Jan.12,1973	
32.32		3444	330	140		Aug.,1956	
32.320		3420		92.68		Jan.9,1964	
17.28. 2.240	Stock			27.6	Dckm ?	Dec.1,1948	

Records of wells from Eddy County, New Mexico

Location	Well Status	Altitude (feet)	Depth of Well(ft.)	Depth to Water(ft.)	Aquifer	Date of Measurement	Remarks
19.30.25.1122	None			22.98		Dec.16,1977	Abandoned windmill
25.12133	Stock	3239		19.53	Trsc	Feb.1,1971	Windmill
25.123	Observation	3245	42.0	22.73		Nov.18,1977	Abandoned windmill
19.31.27.21144	Open cased hole	3573		142.71	Trsc	Feb.1,1971	
27.23344	Oil test	3573		143		Feb.1,1971	Abandoned
28.330	Domestic	3480		180	Dckm	Nov.29,1948	
28.333		3442		110.07		Dec.14,1977	
28.3332	Domestic/stock	3483	200.0	186.87		Dec.15,1977	S.C.2200
28.33433	Stock	3442	180	108.21	Trsc	Feb.1,1971	Abandoned
31.132		3397	4,103	632.55	Cplm	May, 1973	
33.110	Abandoned	3450	160	100.7	Dckm	Nov.29,1948	North well of 3
33.142	Domestic/stock	3455	250	140		Sep.30,1959	
20.26.36.411	Stock	3240		120.0	Clbd	Oct.6,1948	Yield: 1½gpm
20.27.1.110	Stock	3367	200+	186.0	Clbd	Sep.7,1948	Yield: 1gpm
2.42	Stock	3365	145	145+			Dry hole
14.42	Stock	3315	81	66		May, 1972	
21.	Domestic	3238	171	150		Feb.,1963	
29.440	Stock	3190	125	75.5		Oct.6,1948	Yield: 2½gpm
20.28.14.123		3246	171	140	Clbd	Oct.24,1973	Yield: 40gpm
28.200	Stock	3225		30.5	Rs1r ?	Jan.20,1950	
36.140	Stock	3210		19.1	Rs1r ?	Dec.27,1948	
20.29.3.433	Stock	3300		91.9	Dckm/Rs1r	Dec.13,1948	
3.434	Stock, windmill	3300	95.8	88.34		Dec.15,1977	S.C.2300
16.434	Abandoned	3259	103.1	52.28		Dec.15,1977	S.C.2700
20.311	Stock	3246	62.8	43.76		Dec.15,1977	
35.24		3330	339	157		Aug.20,1967	

Records of wells from Eddy County, New Mexico

Location	Well Status	Altitude (feet)	Depth of Well(ft.)	Depth to Water(ft.)	Aquifer	Date of Measurement	Remarks
17.28.14.220	Stock/domestic			80	Dckm ?	Dec.2, 1948	
19.200	Stock			224.3	Ckbf/Rslr	Dec.1, 1948	
22.230	Abandoned stock			45.5	Rslr/Dckm	Oct.14, 1977	
24.224	Stock	3565	33.88	24.2		Oct.14, 1977	
17.29. 8.231	Stock	3617	92.7	90.13			
22.110	Stock	3550		79.7	Dckm ?	Nov.29, 1948	
29.400	Stock			210	Dckm ?	Dec.3, 1948	
17.31.34.000	Stock			271+	Dckm	Dec.6, 1948	
18.27. 8.240	Unused	3505		181.40		Jan.9, 1964	
8.244	Industrial	3513	381	325 ?		Apr., 1951	Oil test
10.200	Unused	3470		46.92		Jan.9, 1964	
10.214	Industrial	3493	130	50		Jul., 1958	
28.13	Domestic/stock	3377	120	100		May, 1960	
28.140	Unused	3415		91.37		Jan.9, 1964	Oil test
33.42	Stock	3447	90	49.3		Sep., 1969	
18.28. 8.330	Stock			81.6	Ckbf/Rslr	Dec.3, 1948	
30.110	Stock/domestic	3560		137.1	Ckbf ?	Dec.2, 1948	
18.29.24.142	Windmill	3436		156.44		Oct.18, 1977	S.C.2600; 21°C
24.23311	Windmill	3436		160.20	Trsc	Apr.8, 1971	
24.300	Stock	3430		158.3	Dckm	Apr.28, 1950	
34.324	Stock	3440		230		Mar., 1960	Yield: 63gpm
18.30.21.4200	Open cased hole	3495	250	266.48	Trcl	Dec.9, 1965	
22.2220	Open cased hole	3430		239.26	Trcl	Apr.8, 1971	
26.4140	Stock	3430	223.0	201.67	Trcl	Dec.14, 1977	S.C. 1100
31.323	Observation	3370	161.0	157.80		Nov.18, 1977	
32.32422	Windmill	3380		161.28	Trcl	Apr.8, 1971	
32.413	Abandoned windmill	3370	266	158.77		Oct.18, 1977	
18.31. 1.44432	Windmill	3797		460.42	Trcl	Apr.7, 1971	
12.223	Stock	3795	480+	453.39		Oct.18, 1977	
12.23144	Stock	3775	600	435.34	Trcl	Apr.7, 1971	

CODE SHEET FOR LOCAL QUALITY OF WATER RECORDS

WATER-BEARING FORMATION

CM	Magdalena	FSR	Seven Rivers
CSC	Sangre de Cristo	PT	Tansill
DEV	Devonian	PY	Yeso
JE	Entrada	PIA	Yates
JM	Morrison	QAL	Alluvium
K	Cretaceous	RIO	River
KD	Dakota	TI	Tertiary Intrusive
PAT	Artesia Group	TUG	Tertiary Ogallala
PB	Bernal	TRC	Triassic (Chinle)
PBC	Bell Canyon	TBS	Triassic (Santa Rosa)
PBS	Bone Springs		
FCA	Castile		
PCP	Capitan Reef		
PDL	Dewey Lake		
PEN	Pennsylvanian		
PG	Glorieta		
PCR	Grayburg		
PCL	Coat Seep Limestone		
PQ	Queen		
PRC	Rustler		
PSA	San Andres		
PSL	Salado (salt section)		

BASIN FILE

C	Carlsbad Underground Water Basin	03	Chaves
CP	Capitan Underground Water Basin	05	Curry
FS	Fort Sumner Underground Water Basin	06	De Baca
H	Hondo Underground Water Basin	08	Eddy
J	Jal Underground Water Basin	10	Quada lupo
L	Lea County Underground Water Basin	13	Lea
P	Portales Underground Water Basin	14	Lincoln
PN	Penasco Underground Water Basin	19	Otero
RA	Roswell Underground Water Basin	20	Quay
SR	Surface Water (springs, etc.)	22	Roosevelt
T	Tularosa Underground Water Basin		
TU	Tucumcari Underground Water Basin		
UP	Upper Pecos Underground Water Basin		

COUNTIES

REFERENCE FILE: Items entered under Reference File column indicate that well has been listed under a combination of file numbers, i.e., L-80 and L-600 Combined-S; or file has been renumbered (L-712-S to L-712-B-S) or in the Roswell Underground Water Basin, i.e., A-26 denotes the number of the well as listed in the Artesian Well Record books. Numbers such as RN-26 denote fiedler and Nye well numbers and CS-42 denotes USGS water level well numbers.

WELL LOCATION: A % sign in space 51 indicates that the Township is an unorthodox township with a † such as 9† or 20†.

Source: NM State Engineer Office

USE

BPW - Brine production well
 COM - Commercial
 CPS - Cathodic production well
 DOM - Domestic
 DPP - Dairy or Packing Plant
 LTC - Domestic type commercial (3 AF right for commercial operation)
 EXP - Exploratory
 FGP - Fish and game propagation
 FFO - Feed pen
 GUP - Generation of power
 HCN - Highway construction
 IND - Industrial
 IRR - Irrigation
 MRG - Manufacturing
 MCO - Mining of ore
 MTU - Municipal type use
 MUN - Municipal
 NOT - Well presently not in use
 OBS - Observation
 ORM - Oil field maintenance
 OIL - Oil
 OWD - Oil well drilling
 PPP - Petroleum processing plant
 REC - Recreation
 SRO - Secondary recovery of oil
 STK - Stock
 SMD - Salt water disposal well
 SMW - Sewage water

POINT OF COLLECTION

BLR - Sample collected from drilling rig bailer
 DISPIT - Disposal pit
 DP - Discharge pipe, DHC valve or leak, stock tank valve
 DST - Drill stem test
 HCL - Hegenman Canal
 HDGATE - Stilling box, concrete box, discharge from earth reservoir
 ID - Irrigation ditch
 JETTED - Water jetted from bottom of well with air
 JET89 - Water jetted from depth of _____ feet
 LAKE - Lake
 OTH - Oil treatment heater
 PKT - Packer test at _____ feet
 RIO - River
 SEBLR - Bailed with sample bottle
 SLPIT - Sample collected from slush pit
 SPRCLR - Sprinkler head or connection
 SUR - Surface river water
 SUS - Spring, seep at ground level
 SWAB - Sample swabbed from well
 TANK - Metal tank, reservoir or storage tank
 TCONF - Top of casing (not flowing)
 TOWF - Top of casing (well flowing)
 TS--- - Trip sampler from depth of _____ feet
 UGV - Alfalfa valve, underground valve
 YT - Yard tap, house tap

COLLECTOR

- CEC - Consulting firm personnel
- DLR - Driller
- EIA - Environmental Improvement Agency personnel
- OCC - Oil Conservation Commission personnel
- ONK - Owner
- PWC - Pecos Valley Artesian Conservancy District personnel
- SEO - State Engineer Office personnel
- USG - U. S. Geological Survey personnel

ADDITIONAL DATA

- * - Two analyses for chloride content run on one sample
- X - More complete analysis available on sample

CARD DATE

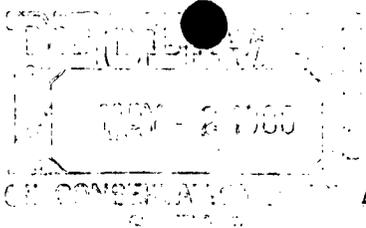
- ABDN - Well has been abandoned
- PLBK - Well plugged back
- PLUG - Well has been plugged
- UVVL - Unable to verify location
- 1076 - Date printout card was made, i.e., month and year

SOURCE

- E - Environmental Improvement Agency Laboratory
- O - Oil Conservation Commission Laboratory
- P - Private Laboratory
- Blank - State Engineer Office Laboratory or PVAOD Laboratory
- U - U.S.G.S. Laboratory

WATER QUALITY IN SOUTHEASTERN NEW MEXICO
LISTED BY LOCATION

Location	DFM	MBF	Use	Date Ctd	Pt. of Cltn.	Citr. Chlorides mg/liter	Conduct. K x 10 ⁶	Temp. deg. F	File No.	Ref. No.	Addl. Card Source Data Date
** 20S.27E.26.24000		PAT	OIL	61/ 6/00	BLR270	DLR	190	3430	0 C		482
20S.27E.26.24000											
** 20S.27E.29.441131		PYA	DOM	44/ 5/03	DP	US6	228	2400	68 C		0585 U
20S.27E.29.441131		PYA	DOM	48/12/08	DP	US6	250	2490	0 C	DP 06409	0485 U
20S.27E.29.441131		PYA	DOM	49/ 2/01	TANK	US6	223	2270	0 C	DP 06409	0485 U
20S.27E.29.441131		PYA	DOM	53/ 3/05	DP	US6	260	2540	0 C		0585 U
20S.27E.29.441131		PYA	DOM	53/ 7/17	DP	US6	274	2580	0 C		0585 U
20S.27E.29.441131		PYA	DOM	53/ 9/19	DP	US6	278	2620	0 C		0585 U
20S.27E.29.441131		PYA	DOM	53/10/31	DP	US6	276	2590	0 C		0585 U
20S.27E.29.441131		PYA	DOM	53/11/20	DP	US6	276	2620	0 C		0585 U
20S.27E.29.441131		PYA	DOM	53/12/08	DP	US6	274	2590	0 C		0585 U
20S.27E.29.441131		PYA	DOM	54/ 3/15	DP	US6	270	2600	0 C		0585 U
20S.27E.29.441131		PYA	DOM	54/ 4/09	DP	US6	276	2610	0 C		0585 U
20S.27E.29.441131		PYA	DOM	54/ 6/25	DP	US6	280	2660	0 C		0585 U
20S.27E.29.441131		PYA	DOM	54/ 7/30	DP	US6	295	2730	0 C		0585 U
20S.27E.29.441131		PYA	DOM	54/11/30	DP	US6	298	2720	0 C		0585 U
20S.27E.29.441131		PYA	DOM	55/ 1/20	DP	US6	290	2690	0 C		0585 U
20S.27E.29.441131		PYA	DOM	55/ 2/25	DP	US6	292	2700	63 C		0585 U
20S.27E.29.441131		PYA	DOM	55/ 3/25	DP	US6	295	2820	0 C		0585 U
20S.27E.29.441131		PYA	DOM	55/ 4/26	DP	US6	205	2700	0 C		0585 U
20S.27E.29.441131		PYA	DOM	55/ 6/17	DP	US6	292	2720	0 C		0585 U
20S.27E.29.441131		PYA	DOM	55/ 7/26	DP	US6	286	2660	0 C		0585 U
20S.27E.29.441131		PYA	DOM	55/ 8/30	DP	US6	264	2640	0 C		0585 U
20S.27E.29.441131		PYA	DOM	55/ 9/22	DP	US6	288	2640	0 C		0585 U
20S.27E.29.441131		PYA	DOM	55/10/19	DP	US6	274	2620	0 C		0585 U
20S.27E.29.441131		PYA	DOM	55/11/30	DP	US6	270	2560	0 C		0585 U
20S.27E.29.441131		PYA	DOM	55/12/28	DP	US6	266	2540	67 C		0585 U
20S.27E.29.441131		PYA	DOM	56/ 1/28	DP	US6	260	2520	0 C		0585 U
20S.27E.29.441131		PYA	DOM	57/ 1/24	DP	US6	260	2710	0 C		0585 U
20S.27E.29.441131		PYA	DOM	61/ 5/23	DP	US6	284	2560	0 C		0585 U
20S.27E.29.441131		PYA	DOM	61/ 8/08	DP	US6	322	2730	71 C		0585 U
20S.27E.29.441131		PYA	DOM	85/ 8/27	YT	SEO	340	2754	0 C		0186
** 20S.27E.31.34333		PYA	OB5	48/12/06	DP	US6	440	3000	0 CP	R 00022	0585 U
20S.27E.31.34333											
** 20S.27E.35.43114		PYA	STK	57/ 1/24	DP	US6	230	3220	0 C		0585 U
20S.27E.35.43114		PYA	STK	85/ 8/28	DP	SEO	270	3583	72 C		0186
** 20S.28E.02.43322		PRC	STK	65/12/07	DP	SEO	60	2975	0 CP		
20S.28E.02.43322											
** 20S.28E.08.41233A		PRC	DOM	49/ 2/03	YT	US6	172	2130	0 CP		0485 U
20S.28E.08.41233A		PRC	DOM	55/ 6/08	DP	US6	185	2210	0 CP		PLUB U



OXY NGL INC.
Box 300, Tulsa, OK 74102

April 29, 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Oil Conservation Division
P.O. Box 2088
State Land Office Building
Santa Fe, NM 87504

Gentlemen:

Subject: Name Change Notification

This is to advise you that effective April 1, 1988, Oxy Cities Service NGL Inc. changed its name to OXY NGL Inc. and Cities Service Oil and Gas Corporation changed its name to OXY USA Inc. OXY USA Inc. operates all natural gas liquid facilities owned by OXY NGL Inc. There is no change in ownership of the OXY NGL Inc. natural gas liquid facilities and they will continue to be operated by the same personnel and management. The address remains the same.

As a result of these name changes and in order for your records to reflect the proper name, OXY wishes to change the name on the following natural gas liquid facilities Discharge Plans to the name of the owner, OXY NGL Inc.:

Facility

- Bluitt Plant, Milnesand, NM 88125
- Burton Flats Plant & Empire Abo Plant
Box 939, Carlsbad, NM 88220

We would appreciate your written acknowledgement of this notice by signing in the place provided below and returning a signed copy to the undersigned. Should you require any additional information or wish to discuss this matter, please do not hesitate to contact R. J. Cinq-Mars at (918) 561-8411. Thank you for your prompt attention to this matter.

Sincerely,

Robert J. Cinq-Mars
Environmental Compliance Manager

RJC/nca

Received this 2 day of May, 1988 by:

Roger C. Anderson
Environmental Engineer

cc: B. Malek
1988 Name Change File

G5/273

MATERIAL SAFETY DATA SHEET

Date Jan., 1

SECTION 1 - Identification

YEMELY USAGE = 55 gal

Product Name Bayhib 108

BAY CHEMICAL AND SUPPLY COMPANY

Chemical Name _____

Chemical Family _____

P. O. BOX 1160 RECEIVED
ODEM, TEXAS 78370
FEB 11 1985

SECTION 2 - Hazard Rating

Hazard Classification:	Health	Flammability	Reactivity
	<u>X</u>		
Composition:	<u>Component</u>	<u>Concentration</u>	<u>Criterion and Val</u>
	<u>Sodium Bichromate</u>	<u>39%</u>	
	<u>Sodium Hydroxide</u>	<u>5%</u>	

SECTION 3 - Physical Properties

Appearance and Odor Brown Viscous Liquid - No Odor

Boiling Point (°F) 212-220 Specific Gravity (Water=1) 1.31 Solubility in Water Complete

Vapor Pressure (mm Hg) _____ Vapor Density (Air=1) _____ Evaporation Rate (____=1) _____

Reacts if Exposed to: Light _____ Air _____ Heat _____ Water _____ Strong Oxidizer _____

SECTION 4 - Fire or Explosion Data

Flash Point (°F) N/A Autoignition Temperature (°F) _____ LEL (%) _____ UEL (%) _____

Extinguishing Media _____ Water _____

Special Firefighting Procedure None

Unusual Fire or Explosion Protection None

SECTION 5 - Health Data

TLV 100 mg/m³ Criterion Chromate as Cr

Effects of Overexposure Irritant, carcinogen

Emergency and First Aid Procedures

Ingestion Ingestion usually induces vomiting. Substances that cause vomiting, such as soapy water, may be taken. Call physician immediately.

Inhalation Avoid mist inhalation. If inhaled, contact a physician.

Skin Flush with water immediately, continue for 15 minutes. Remove contaminated clothing.

Eye Flush with water immediately, continue for 15 minutes. Call physician.

Irritant: Skin X Eye X Inhalation X

Other Data Freeze Pt. 16° F

SECTION 6 - Reactivity

Stable Unstable _____ Conditions to Avoid _____
Incompatibility _____

Hazardous Decomposition Products None

Hazardous Polymerization: No Yes _____ Conditions to Avoid _____

Corrosive: No _____ Yes Materials _____

SECTION 7 - Spills and Leaks

Steps to be Taken in Case Material is Released or Spilled Flush with plenty of water until yellow color disappears.

Waste Disposal Precautions Dispose to proper sewage system or waste treatment facility. Disposal must be in accordance with Local, State and Federal regulations.

SECTION 8 - Special Protection

Respirators: No _____ Yes _____ Type Not required in normal use

Ventilation: Use the guidelines recommended by the American Conference of Governmental Industrial Hygienists in the current edition of "Industrial Ventilation", considering the TLV, Lower Explosive (Flammable) Limit and conditions under which this product is used.

Gloves Rubber Other Protective clothing
Eye Protection Glasses or Goggles

SECTION 9 - Special Precautions

Handling and Storage When empty, dispose of drum properly by burying or professional destruction.

DOT Hazard Label Required: No _____ Yes Specify Corrosive

Other Precautions _____

APPROVED AS ESSENTIALLY SIMILAR TO OSHA FORM 20 (PREVIOUSLY L 58-005-4)

Date _____

SECTION 1 - Identification

Product Name Baycide 373
 Chemical Name _____

YEARLY USAGE = 110 gal

BAY CHEMICAL AND SUPPLY CO.

P. O. BOX 1581
 CORPUS CHRISTI, TEXAS 78403

Chemical Family Microbiocide-
 quaternary ammonium compound

SECTION 2 - Hazard Rating

Hazard Classification: Health	Flammability	Reactivity
<u>X</u>	_____	_____
Composition: <u>Component</u>	<u>Concentration</u>	<u>Criterion and Value</u>
<u>Didecyl dimethyl ammonium chloride</u>	<u>50 %</u>	_____
<u>Isopropyl alcohol</u>	<u>20 %</u>	_____

SECTION 3 - Physical Properties

Appearance and Odor Amber liquid, slight alcohol odor
 Boiling Point (°F) 212-220 Specific Gravity (Water=1) 0.9-1.0 Solubility in Water Complete
 Vapor Pressure (mm Hg) _____ Vapor Density (Air=1) _____ Evaporation Rate (_____ =1) _____
 Reacts if Exposed to: Light _____ Air _____ Heat _____ Water _____ Strong Oxidizer _____

SECTION 4 - Fire or Explosion Data

Flash Point (°F) N/A Autoignition Temperature (°F) _____ LEL (%) _____ UEL (%) _____
 Extinguishing Media Water, dry chemical, CO₂

Special Firefighting Procedure _____

Unusual Fire or Explosion Protection _____

SECTION 5 - Health Data

TLV N/A Criterion _____
 Effects of Overexposure Causes severe eye and skin damage. Do not get in eyes, on skin, or on clothing. Harmful or fatal if swallowed.

Emergency and First Aid Procedures

Ingestion Drink promptly large volumes of milk, egg whites, gelatin solution or if not available, drink large volumes of water. Avoid alcohol. Call physician.
 Inhalation Remove from exposure.

Skin Flush with water for 15 minutes. Remove contaminated clothing.

Eye Flush with water for 15 minutes. Call physician.

Irritant: Skin X Eye X Inhalation X

Other Data _____

SECTION 6 - Reactivity

Stable Unstable _____ Conditions to Avoid _____
Incompatibility _____

Hazardous Decompositon Products _____

Hazardous Polymerization: No Yes _____ Conditions to Avoid _____

Corrosive: No _____ Yes Materials _____

SECTION 7 - Spills and Leaks

Steps to be Taken in Case Material is Released or Spilled Flush with volumes of water to appropriate chemical sewer.

Waste Disposal Precautions Discharge of this material is toxic to fish. Effluent should not be discharged into lakes, streams, ponds, or public waters.

SECTION 8 - Special Protection

Respirators: No _____ Yes _____ Type _____
Ventilation: Use the guidelines recommended by the American Conference of Governmental Indus Hygienists in the current edition of "Industrial Ventilation", considering the TLV, Lower Explosive (Flammable) Limit and conditions under which this product is used.

Gloves Rubber Other _____
Eye Protection Glasses or goggles.

SECTION 9 - Special Precautions

Handling and Storage See label.

DOT Hazard Label Required: No Yes _____ Specify _____

Other Precautions Do not reuse empty drum.

BAYCIDE 373 will control algae and bacterial slirr found in recirculating cooling tower waters and oil field water flood.

BAYCIDE 373 helps clean and loosen slime debris from cooling and flooding system surfaces. When used in slug doses, no other microbicide is required.

BAYCIDE 373 is economical to use because it is concentrated. It should be handled with care.

Precautionary Statements

Hazards to Humans and Domestic Animals

● DANGER

Keep Out of Reach of Children. Corrosive. Causes severe eye and skin damage. Do not get in eyes, on skin, or on clothing. Wear goggles or face shield and rubber gloves when handling. Harmful or fatal if swallowed. Avoid contamination of food.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to fish. Do not discharge into lakes, streams, ponds or public waters unless in accordance with an NPDES permit. For guidance contact your Regional Office of the EPA. Do not apply in marine and/or estuarine oil fields.

STORAGE AND DISPOSAL

- Do not contaminate water, food, or feed by storage or disposal.
- Open dumping is prohibited.
- Do not reuse empty container

PESTICIDE DISPOSAL

Pesticide that cannot be used, or chemically reprocessed should be disposed of in a landfill approved for pesticides or buried in a safe place away from water supplies.

CONTAINER DISPOSAL

Dispose of in an incinerator or landfill approved for pesticide containers, bury in a safe place, or return to drum reconditioner.

BAYCIDE 373

Twin-Chain Quaternary
Ammonium Compound Concentrate
Water Treatment Microbicide
for Building and Industrial
Cooling Towers and Oil Field Water
Flood or Salt Water Disposal Systems

Active Ingredients	% w/wt
Didecyl dimethyl ammonium chloride	50%
Isopropyl alcohol	20%

Inert Ingredients

30%
100%

KEEP OUT OF REACH OF CHILDREN.

DANGER

Statement of Practical Treatment

In case of contact, immediately flush eyes or skin with plenty of water for at least 15 minutes. For eyes, call a physician. Remove and wash contaminated clothing before reuse.

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

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage. Measures against circulatory shock, respiratory depression, and convulsion may be needed.

SEE LEFT PANEL FOR
ADDITIONAL PRECAUTIONARY STATEMENTS
EPA Registration No. 41246-3

Net Weight 400 lbs
Net Volume 55 gals

BAY CHEMICAL AND SUPPLY COMPANY
CORPUS CHRISTI, TEXAS

EPA ESTABLISHMENT NO. 41246-TX-1

Directions for use—
GENERAL CLASSIFIC ON

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

To control algae and bacterial slimes use **BAYCIDE 373** as directed. For best results, slug feed. The frequency of addition of microbicide needed depends on many factors. To optimize your use of **BAYCIDE 373** follow this procedure.

Recirculating Cooling Towers

1. Initially use 6 fluid ounces per 1000 gallons of water to be treated (20 ppm active quaternary). Should the above dosage not give satisfactory results, use 9 fluid ounces per 1000 gallons of water.

Repeat the initial dose every seven days or increase the frequency if needed.

2. When the above treatment level is successful, use 2 to 3 fluid ounces per 1000 gallons of water to maximize efficiency. Repeat weekly as needed. Should slime develop again, go back to initial dosage.

Cooling tower waters that are inherently low in algae growth and bacteria count may be adequately controlled by the lower range of these dosages; slug fed every seven days.

Dilute the appropriate amount of **BAYCIDE 373** in 1 or 2 gallons of water, then add to the tower. Note, this product weighs 7.49 lbs. per gallon (at 20°C). Should tower be heavily fouled, a precleaning is required.

Oil Field Water Flood or Salt Water Disposal Systems: (Do not apply in Marine and Estuarine Oil Fields)

1. For the control of slime forming and sulfate reducing bacteria in oilfield water flood or salt water disposal systems, add 5-10 ppm (active) **BAYCIDE 373** (1½ - 3 gallons per 3000 barrels of water) continuously. Levels for effective control will vary depending on conditions at the site.

2. For intermittent use, dose at a rate of 5-20 ppm (active) **BAYCIDE 373** (1½—6 gallons per 3000 barrels of water) for 4-8 hours per day, one to four times a week as needed to maintain control. Add **BAYCIDE 373** directly from the drum with the proper type of metering equipment. This product weighs 7.49 lbs/gallon (at 20°C).

This product is toxic to fish. Treatment effluent should not be discharged where it will drain into lakes, streams, ponds or public water.

Do not reuse empty drum. Return drum reconditioner or rinse well with soap solution and discard. Do not contaminate water by disposal of waste.

MATERIAL SAFETY DATA SHEET

Date Jan., 1985

SECTION 1 - Identification

YEARLY USAGE = 400 gal

Product Name Bayhib 126

Chemical Name _____

Chemical Family _____

BAY CHEMICAL AND SUPPLY COMPANY

P. O. BOX 1160
ODEM, TEXAS 78370

RECEIVED
FEB 11 1985
BY [unclear]

SECTION 2 - Hazard Rating

Hazard Classification: Health	Flammability	Reactivity
Composition: Component	Concentration	Criterion and Value
1-Hydroxy Ethane, 1,		
1-Diphosphonic Acid	7%	
Ortho Phosphate	10%	
Polyphosphate	15%	

SECTION 3 - Physical Properties

Appearance and Odor Clear Viscous Liquid - No Odor
 Boiling Point (°F) _____ Specific Gravity (Water=1) 1.24 Solubility in Water Complete
 Vapor Pressure (mm Hg) _____ Vapor Density (Air=1) _____ Evaporation Rate (_____ =1) _____
 Reacts if Exposed to: Light _____ Air _____ Heat _____ Water _____ Strong Oxidizer _____

SECTION 4 - Fire or Explosion Data

Flash Point (°F) N/A Autoignition Temperature (°F) _____ LEL (%) _____ UEL (%) _____
 Extinguishing Media _____ Water; Dry Chemical; CO₂

Special Firefighting Procedure None

Unusual Fire or Explosion Protection None

SECTION 5 - Health Data

TLV _____ Criterion _____
 Effects of Overexposure _____

Emergency and First Aid Procedures

Ingestion Induce vomiting with soapy water. Call physician.
 Inhalation Remove from exposure.
 Skin Flush with water immediately, continue for 15 minutes. Remove contaminated clothing.
 Eye Flush with water immediately, continue for 15 minutes. Call physician.

Irritant: Skin X Eye X Inhalation _____

Other Data _____

SECTION 6 - Reactivity

Stable Unstable _____ Conditions to Avoid _____
Incompatibility _____

Hazardous Decomposition Products _____

Hazardous Polymerization: No Yes _____ Conditions to Avoid _____

Corrosive: No _____ Yes Materials Steel, Aluminum, Copper

SECTION 7 - Spills and Leaks

Steps to be Taken in Case Material is Released or Spilled Flush with plenty of water.

Waste Disposal Precautions Flush to drains with large volumes of water. Disposal must be in accord with Local, State and Federal regulations.

SECTION 8 - Special Protection

Respirators: No _____ Yes _____ Type Not necessary in normal use.

Ventilation: Use the guidelines recommended by the American Conference of Governmental Industrial Hygienists in the current edition of "Industrial Ventilation", considering the TLV, Lower Explosive (Flammable) Limit and conditions under which this product is used.

Gloves _____ Rubber _____ Other _____
Eye Protection Glasses or Goggles

SECTION 9 - Special Precautions

Handling and Storage When drum is empty, rinse with water and dispose of properly.

DOT Hazard Label Required: No _____ Yes Specify Corrosive

Other Precautions _____

MATERIAL SAFETY DATA SHEET

Date July 1979

SECTION 1 - Identification

Product Name Bayhib 136
 Chemical Name _____
 Chemical Family Corrosion Inhibitor

YEARLY USAGE = 400 gal

BAY CHEMICAL AND SUPPLY CO.

P. O. BOX 1581
 CORPUS CHRISTI, TEXAS 78403

SECTION 2 - Hazard Rating

Hazard Classification: Health _____	Flammability <u>Non-flammable</u>	Reactivity _____
Composition: <u>Component</u>	<u>Concentration</u>	<u>Criterion and Value</u>
<u>Caustic Soda 50%</u>	<u>20%</u>	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

SECTION 3 - Physical Properties

Appearance and Odor Clear, amber liquid
 Boiling Point (°F) _____ Specific Gravity (Water=1) 1.15 Solubility in Water Complete
 Vapor Pressure (mm Hg) _____ Vapor Density (Air=1) _____ Evaporation Rate (_____=1) _____
 Reacts if Exposed to: Light _____ Air _____ Heat _____ Water _____ Strong Oxidizer _____

SECTION 4 - Fire or Explosion Data

Flash Point (°F) N/A Autoignition Temperature (°F) _____ LEL (%) _____ UEL (%) _____
 Extinguishing Media Non-flammable

Special Firefighting Procedure _____

Unusual Fire or Explosion Protection _____

SECTION 5 - Health Data

TLV N/A Criterion _____
 Effects of Overexposure Skin and eye irritation.

Emergency and First Aid Procedures

Ingestion Induce vomiting with emetic. Contact a physician immediately.

Inhalation N/A

Skin Rinse for at least 15 minutes.

Eye Flush with water for at least 15 minutes. Get medical attention.

Irritant: Skin X Eye X Inhalation _____

Other Data _____

SECTION 6 - Reactivity

Stable Unstable _____ Conditions to Avoid _____
Incompatibility None in recommended dosage

Hazardous Decomposition Products None

Hazardous Polymerization: No Yes _____ Conditions to Avoid _____

Corrosive: No _____ Yes Materials Skin

SECTION 7 - Spills and Leaks

Steps to be Taken in Case Material is Released or Spilled Dispose of by dilution to an approved sewer. Disposal must be in compliance with local, state and federal regulation.

Waste Disposal Precautions Contains caustic soda. Disposal must be in accordance with local state and federal regulation.

SECTION 8 - Special Protection

Respirators: No Yes _____ Type _____
Ventilation: Use the guidelines recommended by the American Conference of Governmental Industrial Hygienists in the current edition of "Industrial Ventilation", considering the TLV, Lower Explosive (Flammable) Limit and conditions under which this product is used.

Gloves Yes Other _____
Eye Protection Face Shield

SECTION 9 - Special Precautions

Handling and Storage None

DOT Hazard Label Required: No _____ Yes Specify Corrosive

Other Precautions None

MATERIAL SAFETY DATA SHEET

TELEPHONE: 512/883-0422

Date Jan., 1985

SECTION 1 - Identification

Yearly Usage = 400 gal

Product Name Bayox 439

Chemical Name _____

BAY CHEMICAL AND SUPPLY COMPANY

Chemical Family _____

P. O. BOX 1160
ODEM, TEXAS 78370

RECEIVED
FEB 11 1985

SECTION 2 - Hazard Rating

Hazard Classification:	Health	Flammability	Reactivity
Composition: <u>Component</u>	<u>X</u>		
<u>Ammonium Bisulfite</u>		<u>70%</u>	<u>Criterion and Value</u>

SECTION 3 - Physical Properties

Appearance and Odor Clear, Greenish-Blue Liquid
 Boiling Point (°F) 212-220 Specific Gravity (Water=1) 1.38 Solubility in Water Complete
 Vapor Pressure (mm Hg) _____ Vapor Density (Air=1) _____ Evaporation Rate (____=1) _____
 Reacts if Exposed to: Light _____ Air _____ Heat X Water _____ Strong Oxidizer X

SECTION 4 - Fire or Explosion Data

Flash Point (°F) N/A Autoignition Temperature (°F) _____ LEL (%) _____ UEL (%) _____
 Extinguishing Media Non-combustible liquid

Special Firefighting Procedure N/A

Unusual Fire or Explosion Protection Releases sulfur dioxide when heated or if in contact with acid.

SECTION 5 - Health Data

TLV Not established Criterion _____
 Effects of Overexposure _____

Emergency and First Aid Procedures

Ingestion Drink plenty of water; induce vomiting. Call physician.
 Inhalation Remove from contaminated area. If symptoms persist, see a physician.
 Skin Wash exposed skin with soap and water. If irritation develops, see a physician. Remove contaminated clothing and wash before reuse.
 Eye Flush with water immediately, continue for 15 minutes. See a physician.

Irritant: Skin X Eye X Inhalation X

Other Data Freeze Pt. -48° F Cloud Pt. +22° F

SECTION 6 - Reactivity

Stable Unstable _____ Conditions to Avoid Temperatures greater than 150° F
Incompatibility Acids - Strong Oxidizers

Hazardous Decomposition Products Gaseous ammonia. Sulfur dioxide.

Hazardous Polymerization: No Yes _____ Conditions to Avoid _____

Corrosive: No _____ Yes Materials Copper, Carbon Steel

SECTION 7 - Spills and Leaks

Steps to be Taken in Case Material is Released or Spilled Rinse with water to proper disposal.

Waste Disposal Precautions Disposal must be in accord with Local, State and Federal regulations.

SECTION 8 - Special Protection

Respirators: No Yes _____ Type _____

Ventilation: Use the guidelines recommended by the American Conference of Governmental Industrial Hygienists in the current edition of "Industrial Ventilation", considering the TLV, Lower Explosive (Flammable) Limit and conditions under which this product is used.

Gloves Rubber Other Protective clothing

Eye Protection Glasses or Goggles

SECTION 9 - Special Precautions

Handling and Storage None

DOT Hazard Label Required: No _____ Yes Specify Corrosive

Other Precautions _____

MATERIAL SAFETY DATA SHEET

Date Jan., 198

SECTION 1 - Identification

YEARLY USAGE = 275 gal

Product Name Bayphos 401

Chemical Name _____

BAY CHEMICAL AND SUPPLY COMPANY

Chemical Family _____

P. O. BOX 1160
ODEM, TEXAS 78370

RECEIVED
FEB 11 198

SECTION 2 - Hazard Rating

Hazard Classification: Health _____ Flammability _____ Reactivity _____

Composition: Component _____ Concentration _____ Criterion and Value _____

Polyphosphate _____ 40% _____ _____

_____ _____ _____

_____ _____ _____

_____ _____ _____

SECTION 3 - Physical Properties

Appearance and Odor Clear Viscous Liquid

Boiling Point (°F) 212 Specific Gravity (Water=1) 1.35 Solubility in Water Complete

Vapor Pressure (mm Hg) _____ Vapor Density (Air=1) _____ Evaporation Rate (____=1) _____

Reacts if Exposed to: Light _____ Air _____ Heat _____ Water _____ Strong Oxidizer _____

SECTION 4 - Fire or Explosion Data

Flash Point (°F) N/A Autoignition Temperature (°F) _____ LEL (%) _____ UEL (%) _____

Extinguishing Media _____ N/A _____

Special Firefighting Procedure _____ None _____

Unusual Fire or Explosion Protection _____ None _____

SECTION 5 - Health Data

TLV _____ Criterion _____

Effects of Overexposure _____

Emergency and First Aid Procedures

Ingestion Induce vomiting with soapy water.

Inhalation Remove from exposure.

Skin Flush with large volumes of water.

Eye Flush with large volumes of water.

Irritant: Skin Slight Eye Slight Inhalation _____

Other Data Freeze Pt. +5° F

SECTION 6 - Reactivity

Stable Unstable _____ Conditions to Avoid Slippery when wet.
Incompatibility Acids

Hazardous Decompositon Products None

Hazardous Polymerization: No Yes _____ Conditions to Avoid _____

Corrosive: No Yes _____ Materials _____

SECTION 7 - Spills and Leaks

Steps to be Taken in Case Material is Released or Spilled Wash with water to approved disposal drain.

Waste Disposal Precautions Disposal must be in accord with State, Local and Federal regulations.

SECTION 8 - Special Protection

Respirators: No Yes _____ Type _____

Ventilation: Use the guidelines recommended by the American Conference of Governmental Industrial Hygienists in the current edition of "Industrial Ventilation", considering the TLV, Lower Explosive (Flammable) Limit and conditions under which this product is used.

Gloves Rubber Other _____

Eye Protection Glasses or Goggles

SECTION 9 - Special Precautions

Handling and Storage When drums are empty, rinse with water and dispose of properly.

DOT Hazard Label Required: No Yes _____ Specify _____

Other Precautions _____

MATERIAL SAFETY DATA SHEET

TELEPHONE: 512/883-0422

Date Jan., 1985

SECTION 1 - Identification

Yearly Usage = 150 gal

Product Name Baypros 805
Chemical Name _____
Chemical Family _____

BAY CHEMICAL AND SUPPLY COMPANY

RECEIVED
P. O. BOX 1160
ODEM, TEXAS 78370
FEB 11 1985
BY KODOL RDT

SECTION 2 - Hazard Rating

Hazard Classification: Health X Flammability _____ Reactivity _____
Composition: Component Concentration Criterion and Value
Alkyleneamine Blend 20% _____

SECTION 3 - Physical Properties

Appearance and Odor Clear, Colorless Viscous Liquid
Boiling Point (°F) 210 Specific Gravity (Water=1) 1.01 Solubility in Water Complete
Vapor Pressure (mm Hg) _____ Vapor Density (Air=1) _____ Evaporation Rate (____=1) _____
Reacts if Exposed to: Light _____ Air _____ Heat _____ Water _____ Strong Oxidizer _____

SECTION 4 - Fire or Explosion Data

Flash Point (°F) 135° Autoignition Temperature (°F) _____ LEL (%) _____ UEL (%) _____
Extinguishing Media Water; Carbon Dioxide; Dry Chemical

Special Firefighting Procedure A solid stream of water directed into hot burning liquid could cause violent frothing. Air supplied respirators should be available.

Unusual Fire or Explosion Protection None

SECTION 5 - Health Data

TLV _____ Criterion _____
Effects of Overexposure Prolong and repeated breathing of vapors will be irritating. Alkaline nature may cause burns.

Emergency and First Aid Procedures
Ingestion Neutralize with vinegar.
Inhalation Remove victim from area. Restore breathing if necessary.
Skin Flush with large volumes of water.
Eye Flush with water immediately, continue for 15 minutes. See a physician.

Irritant: Skin X Eye X Inhalation X

Other Data Freeze Pt. +19° F

SECTION 6 - Reactivity

Stable Unstable _____ Conditions to Avoid _____
Incompatibility _____ Strong Acids _____

Hazardous Decomposition Products Thermal decomposition or burning can cause the emission of carbon monoxide, carbon dioxide and nitrogen oxides.

Hazardous Polymerization: No Yes _____ Conditions to Avoid _____

Corrosive: No _____ Yes Materials Copper based alloys

SECTION 7 - Spills and Leaks

Steps to be Taken in Case Material is Released or Spilled Flush with plenty of water.

Waste Disposal Precautions Neutralize if necessary. Disposal must be in accord with Local, State and Federal regulations.

SECTION 8 - Special Protection

Respirators: No _____ Yes Type Air supply mask

Ventilation: Use the guidelines recommended by the American Conference of Governmental Industrial Hygienists in the current edition of "Industrial Ventilation", considering the TLV, Lower Explosive (Flammable) Limit and conditions under which this product is used.

Gloves _____ Rubber _____ Other _____
Eye Protection Glasses or Goggles

SECTION 9 - Special Precautions

Handling and Storage Ventilation should be adequate

DOT Hazard Label Required: No _____ Yes Specify Corrosive

Other Precautions _____

FANNIE LEE MITCHELL, Inc.

TRUCKS AND TRANSPORTS

P.O. BOX 1327

LOVINGTON, NEW MEXICO 88260

March 3, 1983

RECEIVED

MAR 24 1983

P E M SECTION

Mr. Raymond R. Sisneros
 State of New Mexico
 Environmental Improvement Division
 P.O. Box 968
 Santa Fe, New Mexico 87504-0968

Dear Sir:

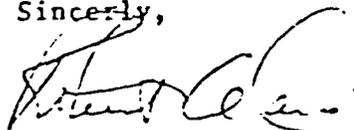
Responding to your letter of March 16, 1983, we remove a varying amount of spent caustic acid from the Cities Service Gas Plant near Milensand, New Mexico each year. The yearly total is roughly 400 barrels and actual transportation occurs 2 or 3 times per year.

The caustic acid is used at the plant to remove sulfur from liquid petroleum products and when transported by our company has dissipated to a strength of approximately 3%.

We haul the spent caustic in a plastic lined tank truck and dispose of it at Pollution Control, a commercial facility located between Hobbs and Carlsbad.

Please let me know if you have any questions.

Sincerely,



Robert A. Caudle
 Fannie Lee Mitchell, Inc.

RAC/vlv

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.

CITIES SERVICE COMPANY, Burton Flats Gas Processing Plant (Section 14, Township 20 South, Range 28 East, NMPM, Eddy County, New Mexico) P. O. Box 300, Tulsa, Oklahoma 74102, proposes to discharge less than one gallon of waste water per day. The waste water is derived from the plant process. Under normal operations, no waste water is generated. Should any be generated it will be disposed of into a lined evaporation pit on the plant property.

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 Date:

12/8/83 (ARTESIA)

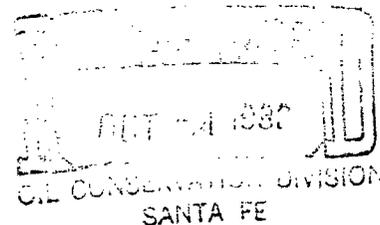
Also ALB.

CITIES SERVICE COMPANY

BOX 300

TULSA, OKLAHOMA 74102

October 1, 1982



Mr. Joe D. Ramey, Director
Energy and Minerals Department
Oil Conservation Division
P.O. Box 2088
Santa Fe, NM 87501

Dear Mr. Ramey:

SUBJECT: Discharge Plans for Abo, Burton Flats and
Bluitt Plants

As required, herewith submitted are the discharge plans for the subject Cities Service plants located in New Mexico. I am sure you will find the plans complete, in depth and in accordance with the Oil Conservation Division guidelines.

If there are any questions regarding any of the plans, do not hesitate to call me at (918) 561-2498. We will be happy to meet with you at any time in your offices for discussion. Your Division's help in these matters have been greatly appreciated.

Sincerely,

NATURAL GAS LIQUIDS DIVISION

A handwritten signature in cursive script that reads "Steve Innes".

Steve Innes
Environmental Coordinator

SI/lw

Enclosure

cc: Oscar A. Simpson

Cities Service Company

Burton Flats

Gas Processing Plant

Discharge Plan

Submitted to:

New Mexico Oil Conservation Division

Santa Fe, New Mexico

Prepared by:

Natural Gas Liquids Division

September, 1982

Summary

Cities Service Company began its 7.5 MMCFD Burton Flats cryogenic gas processing facility in 1976. There are no discharges off site and the 55 ft. by 55 ft. lined spill containment pond on site receives no wastewater flow of any kind normally. Its purpose is to catch overflows or spills from three unit processes and contain them for short periods. The pond is then pumped dry and contents hauled off. There is no known obtainable groundwater in the plant's immediate vicinity.

The pond will continue to be utilized in this capacity in the future, but with a more formalized inspection and maintenance program.

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I. Introduction

This report is submitted in accordance with Section 3-106 of the New Mexico Water Quality Control Commission Regulations, WQCC81-2, as required by the New Mexico Oil Conservation Division and includes a plan of containment for wastewater and materials associated with the operation of Cities Service Company's Burton Flats Gas Processing Plant.

II. History and Background of the Plant

In the summer of 1976, Cities Service Company began consideration of a gas processing plant in the North Burton Flats area of Eddy County, New Mexico, based on the possibility of an enhanced recovery project in the Wolfcamp reservoir. Analysis of gas from the Wolfcamp and Atoka formations, along with facilities cost studies, led to the decision to construct gathering, processing, and delivery facilities in the area. It was decided that a skid-mounted cryogenic plant unattended 16 hours per day would be the optimal operation. This type of operation has negligible wastewater quantities with no cooling tower or boilers. Also, no flare was required because of the composition of the inlet raw gas. The plant was completed and put into operation in the fall of 1977 and has a design capacity of 7.5 million cubic feet per day.

III. Environmental Description

Geology

The plant is located in the Pecos River Valley on the shelf of the buried Capitan Reef Front which goes through the city of Carlsbad. Figure 3.0 shows the generalized geology of the Eddy County area. Gypsiferous rocks of the Permian System underlie the Burton Flats plains. The Permian System is the oldest of the geologic systems in the Eddy County. The gypsiferous group includes the Rustler, Castile, Tansill and undifferentiated rocks of the Guadalupe Group. Of the underlying carbonatic rock formations, the Capitan consists of fossiliferous, calcitic limestone. The Dewey Lake Redbeds lie above and gypsum land is a representative land type. Figure 3.1 is a composite cross-section of Eddy County indicating the various units.

The Tertiary System is found northeast of Loco Hills where the Ogallala formation is prominently exposed in the Mescalero Escarpment. This escarpment is generally considered to be the zero line of saturated thickness and the well known Ogallala aquifer lies to the northeast with a thickness of up to 200 feet in the Lovington area.

Climate

Typical of the Southeastern plains of New Mexico, the Eddy County area has a semiarid, continental climate. There is abundant sunshine, erratic rainfall, low relative humidity and a wide deviation in

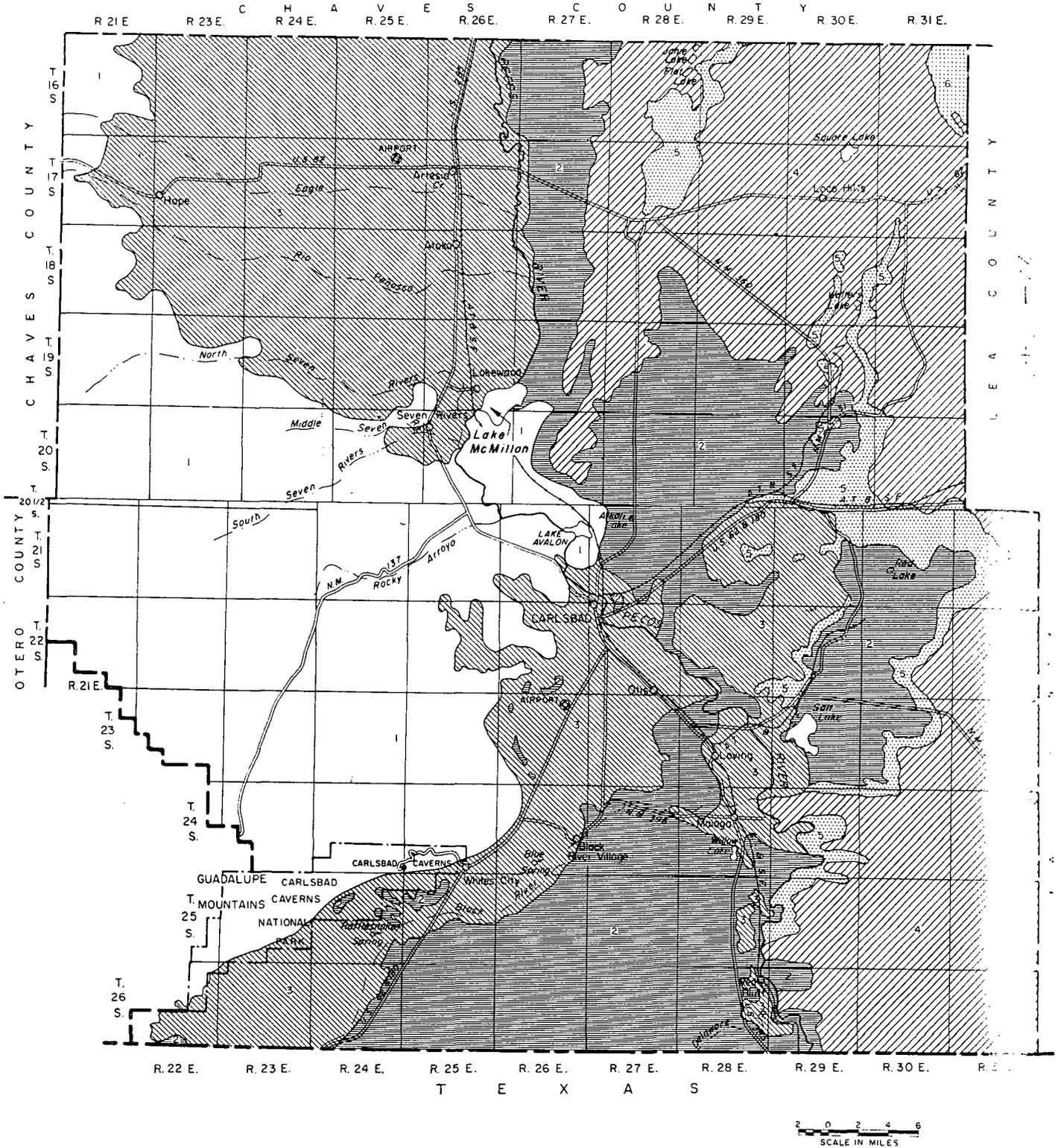


Figure 19.—Generalized geologic map of the Eddy Area, New Mexico:

1. Rocks of Permian age, primarily carbonatic.
2. Rocks of Permian age, primarily gypsiferous.
3. Loamy deposits of Quaternary age.
4. Sandy deposits of Quaternary age.
5. Rocks of Triassic age.
6. Rocks of Tertiary age.

daily and seasonal temperatures. Winters are short and moderate while summers are long and hot. The average annual rainfall is 12 inches with most of the precipitation falling in summer. Brief, heavy thunderstorms occur frequently in June through August, and as many as forty can occur in a year. There is measurable rainfall 42 days per year, average. Evaporation is immense and most of it generally coincides with the months of the highest rainfall, May through October. It ranges from 100 to 110 inches per year from a Class A measuring pan and lake evaporation averages 69 inches.

The prevailing winds are from the southeast, but they generally shift to southwesterly in winter. Windspeeds range from an average of 10 miles per hour in September to 16 miles per hour in March.

Hydrogeology

With the general absence of the Tertiary System and the Ogallala Formation, there is little ground water of much importance in the northeast Eddy County area. Again, Figure 3.1 indicates the lack of good yielding water bearing formations. Figure 3.2 from the U.S. Soil Conservation Service Soil Survey for Eddy County illustrates the general soil association found in the plant vicinity. The Soil Conservation Service states, "there are few natural springs or seeps, and ground water is hard to locate" in this association. It further states that ground water "is of poor quality" in places where found. Ground-Water Levels in New Mexico, 1977 has none of

its 5,000 wells in the plant's township while there are numerous wells in the Carlsbad and Capitan Reef Areas.

Indeed, the lack of ground water in the area of any quality was such a well established fact that Cities Service Company did not seek to find any, and no test holes were put down on site or in the vicinity.

Surface Hydrology

Most all of Eddy County is in the Pecos River drainage basin. The general soils in the plant vicinity are given by the U.S. Soil Conservation Service as the "Reeves - Gypsum land - Cottonwood Association." This is characterized by "loamy soils that are very shallow to moderately deep over Gypsum beds and Gypsum land." There is little or no surface water in these areas except after a rain for short periods of time. Ranches cover many square miles because of the lack of water and sparse vegetation.

The specific soil on the plant site is Gypsum land - Reeves complex (GR) while a similar soil, Reeves - Gypsum land complex (RG), lies in close proximity to the west, as can be seen in Figure 3.3. Both of these soils are relatively flat with 0 to 3 percent slopes. The SCS says the GR soil is "very droughty" with a "low to very low" water-holding capacity. Permeability is rapid in the surface layer of the soils and the low sand dunes. As seen on the plot plan of the plant, there is only 2.5 to 3 feet of elevation change across the site. Therefore, very little runoff would be expected from the plant site during anything but the heaviest possible rainfall event.

IV. Water Quality

Since there are only intermittent watercourses in the area which are normally dry and only a very few of them at that, surface water quality is indeterminate. The nearest well, as indicated by the U.S. Soil Conservation Service Soil Survey, is nearly two miles away. As mentioned previously, groundwater is difficult to locate and any water bearing formation is likely discontinuous. Therefore, no meaningful data was found to be generally available.

V. Plant Description

Location

The plant is located in Eddy County about 10 miles northeast of the City of Carlsbad in an area known as Burton Flat as seen in Figure 5.0. The site is relatively flat and encompasses 8.3 acres, 600 ft. by 600 ft. The Plot Plan (Dwg No. 619-100-E1) in the Appendix shows the general plant layout.

Process Description and Schematic

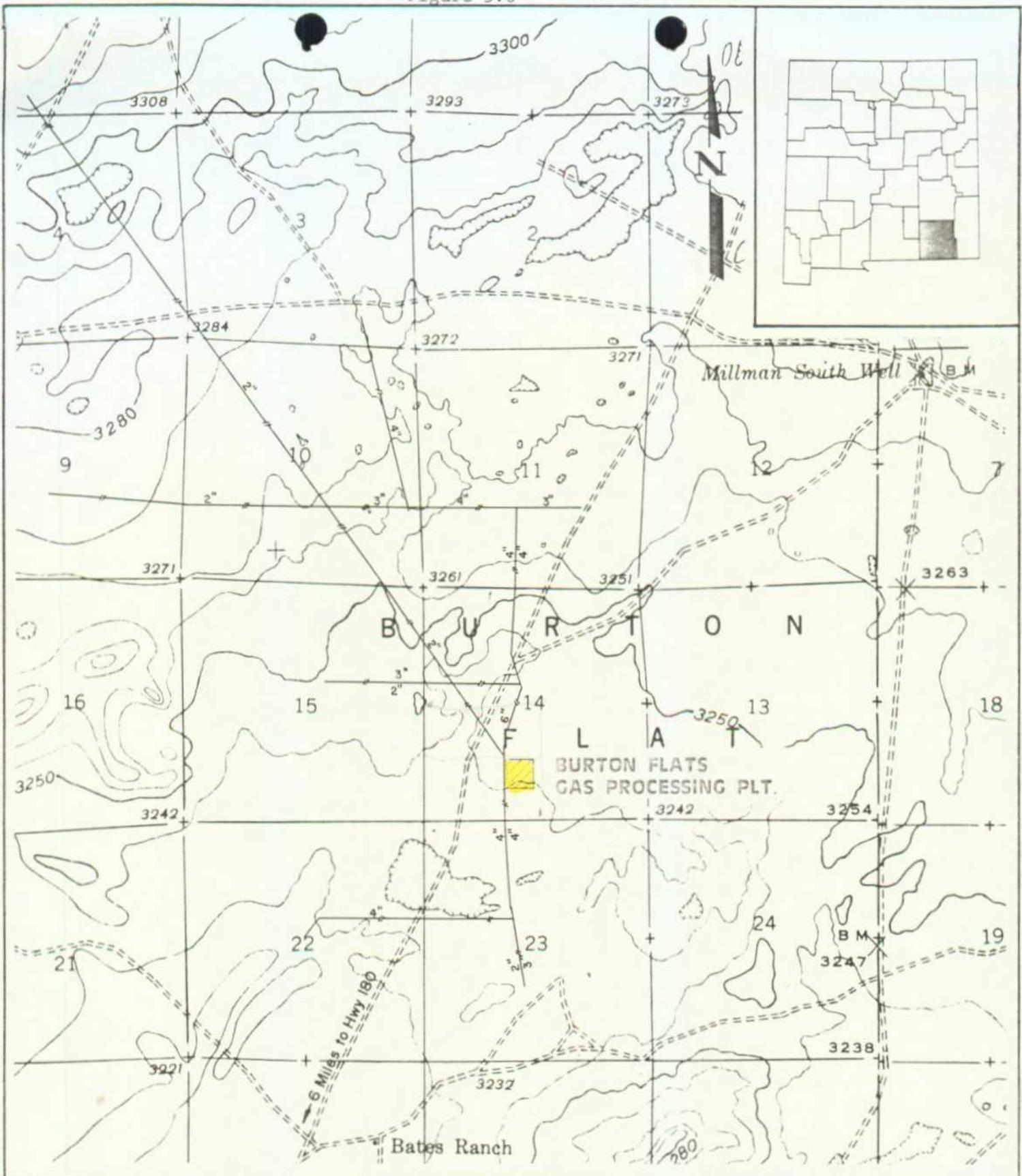
Gas processing at the plant may be divided into four separate functions: inlet facilities, dehydration, gas chilling, and separation. Each function described below can be followed on the flow diagram, Figure 5.1.

1. Inlet Facilities:

Inlet facilities are provided to:

- A. Separate the vapor and liquid
- B. To compress the gas from 500 psig to 915 psig and cool the gas after compression to 120°F.

Figure 5.0



PLANT LOCATION
 SEC. 14, T-20-S, R-28-E
 APPROX. EL. 3240'
 APPROX. LAT. 32°34'25"
 APPROX. LONG. 104°08'44"

CITIES SERVICE COMPANY

GENERAL ENGINEERING

TULSA, OKLAHOMA

BURTON FLATS GAS PROCESSING PLT.
 EDDY COUNTY, NEW MEXICO

C. S. C.
 CO. OWNED
 CO. OPERATED
 SOUTHERN
 REGION

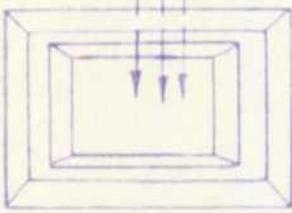
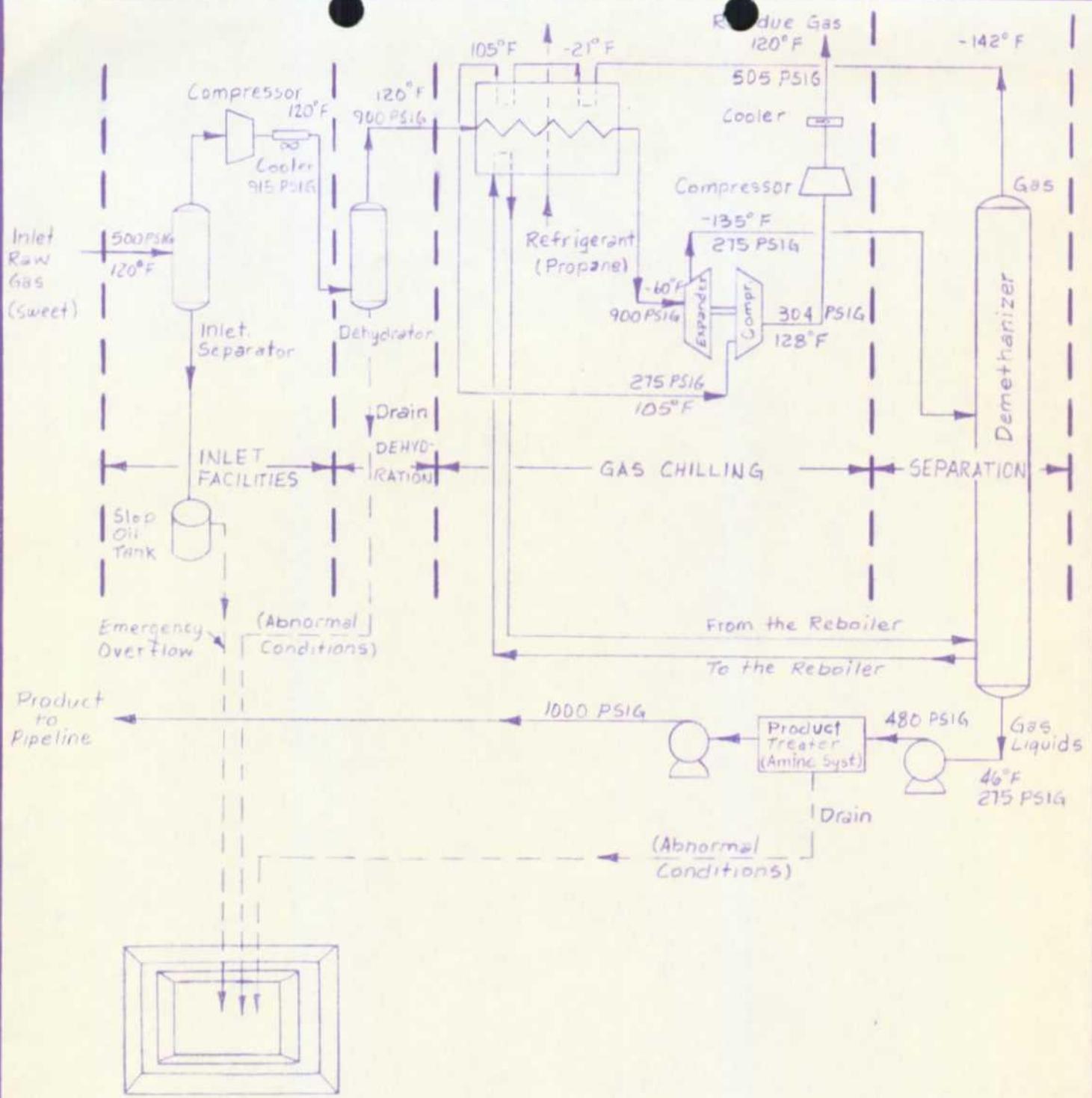
SCALE

DATE

1" = 3000'

1-1-82

Figure 5.1



Overflow and Spill Containment Pond

REV	DATE	SCALE	UTS	DATE

CITIES SERVICE COMPANY

BURTON FLATS PLANT

TITLE	DWG. NO.	REV.
PROCESS FLOW WITH LIQUID WASTE CONNECTIONS	619-101-A	

GEN. ENGR. DEPT. TULSA, OKLA.

2. Dehydration:

In order to avoid ice and hydrate formation in the low temperature portions of the plant, it is necessary to reduce the water content of the gas to an acceptable level. This is done in the dry bed desiccant dehydrator.

3. Gas Chilling:

Gas is fed from the dehydration system to the chilling portion of the plant at about 900 psig and 120°F. The inlet stream is cooled to -60°F by exchange with 5 different streams in the process heat exchangers. The gas is then fed to the turbo-expander where work is removed and the stream reduced in pressure to 275 psig and in temperature to -135°F. The resultant condensed liquids and remaining vapors are fed to the demethanizer.

4. Separation:

The demethanizer is a stripping column which will separate the plant product from the residue gas and will aid in making specification product. The product from the demethanizer is pumped to 480 psig, treated and pumped to 1,000 psig before being delivered to the product pipeline. Residue gas leaves the top of the demethanizer at 275 psig and -142°F. The stream is heated to about 105°F by exchanging heat with different streams. The gas is then compressed to 304 psig and 128°F in

the expander compressor. Final sales gas compression to 505 psig and 210°F is provided in the packaged compressor. Residue gas is then cooled to 120°F before being delivered to pipeline.

Cooling Water

There are no open system cooling requirements in this type of gas plant and therefore no cooling tower. There is also no boiler blowdown. There is one closed cooling system and that is the jacket water system on the Waukesha compressor. Because the plant is unattended 16 hours per day, antifreeze (glycol) is used in the system. No corrosion inhibitors are used.

Water Supply

Since there are no wells on site, all water comes from off site. Makeup water for the compressor is hauled in by a Carlsbad company and is stored on site in the 100 barrel above-ground tank. Drinking water is hauled in periodically by a commercial company in large bottles.

VI. Disposal Practices

There are no continuous wastewater flows from any of the plant processes and therefore no need for any surface discharges from the plant site. As noted previously, the purpose of the pond on site is to catch and contain possible overflows from the slop oil tank and upset flows and spills from the dehydrator and the product treater. The pond, as seen in the northeast corner on the plot plan, is 55' x 55' at the top inside of the dike, and 10' deep. The slopes inside and outside are 1 to 1 and the lining is nylon reinforced neoprene. Factory fabricated "boots" seal the locations where the four inlet pipes come through the inside slope. One of the inlet pipes carries gaseous carbon dioxide to the pond from the product treater.

Sanitary sewage from the office goes to a septic tank - soil absorption system located on the property. With at most 2 employees on site each day there will be no more than 64 gallons per day using USEPA figures of 32 gallons per employee per day.

The slop oil tank receives liquids from the plant inlet separator. This tank has a capacity of 100 bbl. and is pumped and hauled by Watson Trucking, currently. It is regularly pumped when it reaches the two-thirds level leaving a safety factor of about 4 weeks before it would become completely full. The liquids are made up of condensed hydrocarbons, water and hydrocarbon-water emulsions. The tank has a 3 ft. high dike on all 4 sides to contain any tank leak.

There are no unusual or great amounts of solid waste generated on site. There is no caustic or other possibly hazardous waste.

Besides the typical office waste, there is only spent dryer beads from the dehydrator which are handled in barrels and replaced about every 5 years and standard oil filters from the engine and compressors.

VII. Containment Plan ("Discharge Plan")

Disposal Methods

The current method and procedures for waste liquid containment and disposal at Burton Flats will continue. The slop oil tank will continue to be emptied well in advance of need and the contents taken by a contract hauler in compliance with the applicable state and federal regulations and disposed of or recycled. Procedures at the plant will continue to minimize conditions which would result in an overflow from this tank into the pond.

The drains from the dehydrator and product treater will remain connected to the pond. Discharges from these units will continue to be only for abnormal conditions and in discrete amounts.

The pond will normally be kept empty and dry. In no case will it be allowed to have a freeboard of less than 3 feet. The pond will be pumped by the contract hauler for the slop oil tank or an equally capable and approved contractor. Continual efforts will be made by plant personnel to keep tumbleweeds, debris and other extraneous material out of the pond.

Contingency

Power failures at the plant occur no more than once per week on an annual average with most bunched up in the spring. These normally

last only minutes with the longest being no more than a couple of hours. However, when the power goes off and the plant goes down, feedstock gas bypasses the plant. Therefore, there can be no wastes generated during a failure and a power failure represents no special environmental problem.

There appears to be little probability of flash flooding being of particular concern at Burton Flats. The flatness and higher elevation of the terrain, the high permeability of the Gypsum-Reeves soil, and a 100-yr. 6-hr. rainfall event of less than 4.2 inches all add up to very little probability for the pond dikes (over 2 ft. high) to be overtopped by runoff water. Plant personnel recall no more than 2-3 inches of water on the plant site in a hard downpour.

In all reality, the containment pond on site is a contingency pond. It is available to receive most all plant liquids which do not readily evaporate for all plant upsets of any consequence whether they come from natural catastrophies or processing malfunction. If the contract hauler cannot pump the pond should the level become critical, there will be no problem in obtaining a backup since there is quite a lot of gas and oil field activity in the area.

Inspection and Reporting

Each year the pond will be emptied, if not already so, cleaned and inspected. The liner will be examined for rips, holes, cracks, compromised seals or anything which would allow liquid to pass

through the liner. All leaks will be repaired in a professional manner before putting the pond back into service. Before the liner reaches the end of its useful life, it will be replaced with a liner of equal or better quality.

All spills of hazardous materials occurring on the plant site that are not caught by the containment pond will be reported to the Oil Conservation Division. Any instance where the pond would overflow or where there would be a significant leak through the liner would be reported also.

Plan Summary

1. All plant wastewater which may occur will be collected in an evaporation pond which will prevent any discharge from the plant property; all liquid waste will be contained in the pond.
2. The pond will be inspected daily. A minimum of a 3' freeboard will be maintained in the pond at all times. If severe storms or other abnormal events threaten to cause a pond overflow, vacuum trucks will be employed to haul off the contents to an approved disposal site.
3. The pond will be emptied completely on an annual basis, cleaned and the liner inspected. Any necessary repairs will be made promptly.
4. The slop oil tank will be emptied well in advance of need to preclude overflows and contents properly disposed of.
5. Drummed chemicals will be kept stored in an upright position to preclude any dripping or tap accidents.

VIII. Conclusions

The Burton Flats Plant is as environmentally clean and safe as can be found in the gas processing industry today. Its cryogenic process allows it to operate without continuous wastewater streams. There is no sulfur in the feedstock gas to deal with.

By all information and data available, there is no ground water under the Burton Flats Plant or in the general vicinity. However, without conclusive data in the form of dry holes in the immediate plant vicinity, we look past Section 3-109C.1 to Section 3-109C.3.b(1) of WQCC81-2 for alternative approval requirements. The first requirement is that an impoundment not have more than 0.5 acre-feet per acre-year enter the subsurface for plan approval. With Burton Flats' 0.069 acre pond, this equates to 0.035 ac-ft/yr or 950 gal/mo. The typical circumstance is that zero gallons would enter the pond each month and therefore, zero gallons would enter the subsurface. But if two month's contents (2800 gal.) of the slop tank leaked into its containment dikes, only about 1100 gal. would go into the pond because of the elevation of the overflow pipe. It would take considerable sized openings in the liner for 950 gallons of this to pass through to the subsurface. With the liner completely intact, only 2.3 gal/mo. would be allowed through (using manufacturer's data). This, coupled with the fact that in practice the pond is normally empty and dry, it can be seen that the possibility of 950 gal/mo. reaching the subsurface is extremely remote. The second and third paragraphs under the same subsection do not have to be satisfied as long as the first is.

In view of these factors, the Burton Flats operation should not be considered as having any significant potential for liquid waste reaching the subsurface, and it certainly constitutes no more than the remotest threat to closest groundwater.

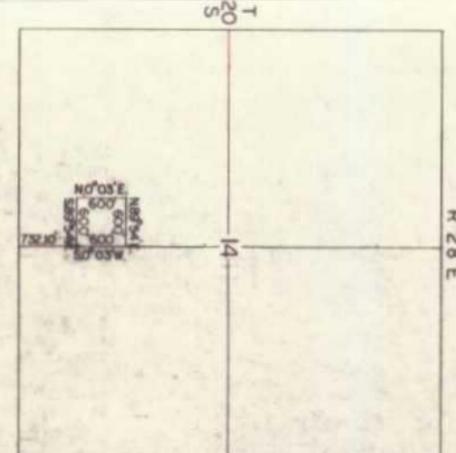
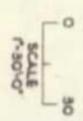
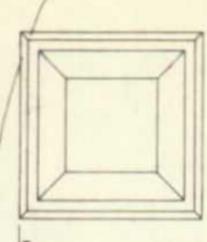
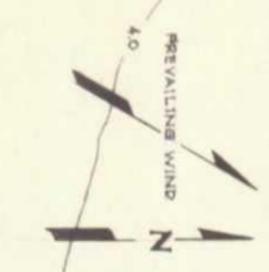
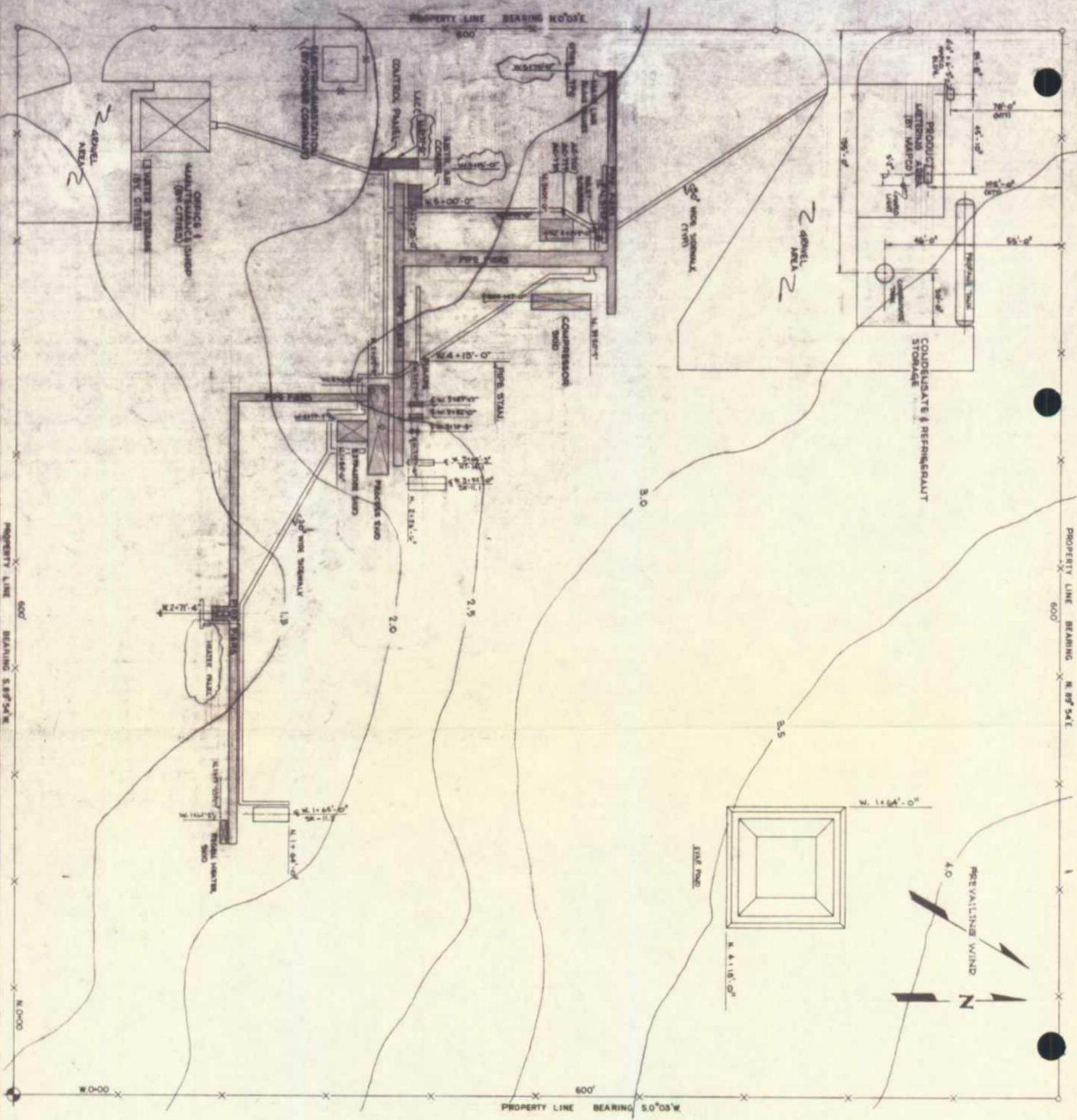
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X. Appendix



GENERAL NOTES

GENERAL NOTES

CHG. NO.

PROPERTY LINE BEARING S 87° 54' W

NO.

REVISION

BY DATE CHK. APR. 1

NO.

REVISION

BY DATE CHK. APR. 1

NO.

REVISION

BY DATE CHK. APR. 1

NO.

REVISION

77-744 TULSA PRO-QUIP, INC. TULSA, OKLA.

FOR CITIES SERVICE OIL COMPANY

PLOT PLAN

BURTON FLATS PLANT

EDDY COUNTY, NEW MEXICO

DOUGLAS WHITE, ARCHT. & ENGRS. 427/111 S.W. 4th St., OKLA. CITY, OKLA. 73101

DATE: 4-27-77

SCALE: AS SHOWN

PROJECT NO. 688-100-ET

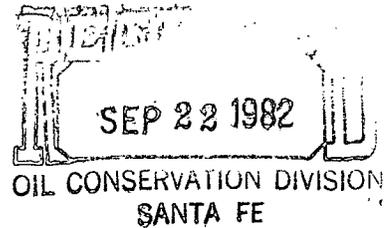
DATE: 4-27-77

CITIES SERVICE COMPANY

BOX 300

TULSA, OKLAHOMA 74102

September 17, 1982



Mr. Joe D. Ramey, Director
Energy and Minerals Department
Oil Conservation Division
P.O. Box 2088
Santa Fe, NM 87501

Dear Mr. Ramey:

Subject: Monthly Progress Report - Discharge Plans
Abo, Burton Flats, Bluitt Plants

The fourth and last monthly reporting period for Cities Service Company has been primarily one of analysis, review, and drafting of report material. Several final pieces of reference material have come in.

The plans are in the last stages of development. One report is essentially complete, needing final review. The plans will all be complete and forwarded to your office by the end of the month.

If there are any questions, please don't hesitate to give me a call.

Sincerely,

NATURAL GAS LIQUIDS DIVISION

Steve Innes
Environmental Coordinator

SI/bs

cc: Oscar A. Simpson

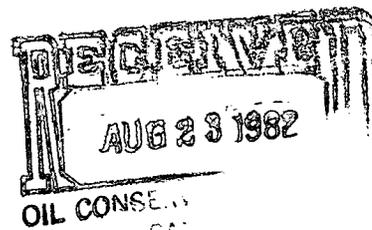
CITIES SERVICE COMPANY

BOX 300

TULSA, OKLAHOMA 74102

August 17, 1982

Mr. Joe D. Ramey, Director
Energy and Minerals Department
Oil Conservation Division
P. O. Box 2088
Santa Fe, NM 87501



Dear Mr. Ramey:

Subject: Monthly Progress Report - Discharge Plans
Abo, Burton Flats, Bluitt Plants

The third monthly reporting period for Cities Service Company has been basically one of data analysis, literature review, and rough drafting of report material.

The results of samples collected June 15, 1982, from the Bluitt Plant have been received from our Central Analytical Laboratories. These have been put into tabular form and listed in the same order as given in Section 3-103 of the WQCC Regulations for ease of review.

We have received and reviewed two reports which have come in. One is on the climate of New Mexico and the other is on ground water levels in the state.

Also, we have received and reviewed two sets of U.S. Geological Survey maps. One shows the eight-state High Plains Aquifer at a 1:2,500,000 scale. The other shows the Ogallala Formation and its ground water at a scale of 1:500,000, but is discontinuous or nonexistent in the areas of our plants.

If there are any questions, please don't hesitate to give me a call.

Sincerely,

NATURAL GAS LIQUIDS DIVISION

Steve Innes
Environmental Coordinator

SI/sm

cc: Oscar A. Simpson

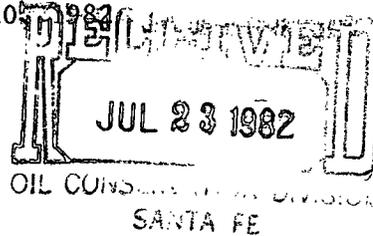
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CITIES SERVICE COMPANY

BOX 300

TULSA, OKLAHOMA 74102

July 20, 1982



Mr. Joe D. Ramey, Director
Energy and Minerals Department
Oil Conservation Division
P. O. Box 2088
Santa Fe, NM 87501

Dear Mr. Ramey:

Subject: Monthly Progress Report - Discharge Plans
Abo, Burton Flats, Bluitt Plants

During the second monthly reporting period Cities Service Company has had accomplishments in several areas and continued progress in others in following a path toward compliance with the state regulations on discharge plans. The month was generally characterized by completion of some important onsite work, receipt of maps and continued research and correlation of information.

The ponds at both Burton Flats and Abo were completely cleaned by a contractor. The pond liner at Burton Flats was sealed professionally at the seams, and at the area where inlet pipes come through, "boot" kits were employed. At both Burton Flats and Abo, plant personnel built new storage racks for chemicals in 55-gallon drums. These racks are modeled after manufactured units which allow the drums to be stored vertically with the taps on top precluding dripping and spillage due to tap accidents.

At Bluitt, plant personnel constructed a three foot dike around the slop oil tank to contain any possible spillage. They re-routed a small interstage line (produced water) from the inlet gas scrubber so that it could not discharge south off the property. Also, the evaporative cooler water was redirected to stay on the property and it now goes to the flare pond.

We have received a number of maps which had been ordered. Soil survey maps of all three plant areas from the U.S. Soil Conservation Service have come in. Flood maps have come in for Eddy County and the City of Portales from the Federal Emergency Management Agency, but these may not be of much help. We have received our USGS topographic quadrangle maps from our library and some hydrogeologic maps from the New Mexico State Engineer Office. Most of the hydrogeologic maps were not of the correct areas and it seems that the State Engineer does not have any for Burton Flats or any showing the "Red Beds" near the Bluitt Plant. We are currently checking for these internally and with the USGS Office in Denver. Aerial photos of each plant were put on order early this month, but we were told they will take four to six weeks to obtain.

CITIES SERVICE COMPANY

BOX 300

TULSA, OKLAHOMA 74102

June 22, 1982

JUN 24 1982

OIL CONSERVATION DIVISION
SANTA FE

Mr. Joe D. Ramey, Director
Energy and Minerals Department
Oil Conservation Division
P. O. Box 2088
Santa Fe, NM 87501

Dear Mr. Ramey:

Subject: Monthly Progress Report - Discharge Plans
Abo, Burton Flats, Bluitt Plants

Cities Service Company has proceeded with a number of activities during this first period which will lay a firm foundation for formulating discharge plans for each of our three plants. Primarily this has involved facility surveys, sampling, research and planning.

Facility surveys were conducted at each of the three plants on May 26 and 27, 1982 by the Manufacturing Services Environmental Section. These consisted basically of collecting current information on operations and equipment usage onsite. The information is essential and will be used later in conjunction with file information and sampling results. Also, the New Mexico Oil Conservation Division inspections of the three plants on June 8 and 9, further afforded us the opportunity to go over operations.

On sampling, we have completed the basic collection of samples and this has been accomplished in advance of the June 25 date which we stated in our letter of May 21, 1982. Samples were collected at Abo and Bluitt on May 26 and 27 and again at Bluitt on June 15. These are currently being analyzed at the Cities Service Central Analytical Laboratories in Tulsa. Additionally, samples were collected at Bluitt on June 8 by Bay Chemical, our water treating company, and the results have just become available. No samples were collected from Burton Flats since there are no continuous or intermittent flows going into the spill containment pond. Only emergency overflows are allowed into this pond.

Under research and planning we have done a number of things:

1. Soil, hydrogeological, and topographical quadrangle maps for the areas have been ordered. Plot plans from our drafting service have been ordered and received.
2. A formal request has been made internally for determinations on the possible usage or generation of toxic substances as listed under 1-101.X of the WQCC 81-2 regulations.

3. A definitive timetable has been developed so that tasks may be accomplished in a sequence which will best assure compliance with the October 4, 1982, deadline.
4. A literature search for technical background information has been initiated.

In summary, we are on schedule and plan to continue devoting sufficient time and the resources necessary to assure compliance. Please contact me at (918) 561-2498 if you have any questions or comments.

Sincerely,

NATURAL GAS LIQUIDS DIVISION

Robert W. Bonnell

For Steve Innes
Environmental Coordinator

SI/sm

(2)

CITIES SERVICE
INTEROFFICE LETTER

June 11, 1982

To: Ken McDonnell
From: Clarence Patterson
Subject: Discharge Plans for Empire Abo and Burton Flats Plants.

On 6-9-82, Mr. Oscar Simpson from the New Mexico Oil Conservation Division, Energy and Minerals Department, made a tour of the Empire Abo and Burton Flats Plants. Also present were Mr. W. J. Templeton and Mr. Steve Innes from our Tulsa Office.

The purpose of this inspection was to inspect the Plant to aid in the assembling of the New Discharge Plans.

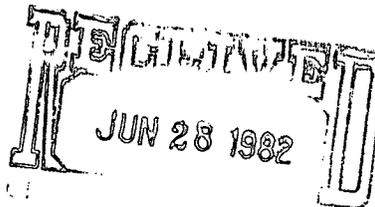
It was determined that Discharge Plans were necessary for both Burton and Abo. Mr. Innes and Mr. Templeton will take care of this.

It was also determined that we need to clean out and inspect the Evaporative Ponds annually.

There were no other problems located at Burton Flats or Empire Abo Plants.

cc: D. W. Kemp
W. J. Templeton
R. W. Bonnell
D. F. Southard
O. A. Simpson
file

CRP/jwf



INSPECTION INFORMATION FORM

CITIES SERVICE COMPANY WELCOMES YOU AS A VISITOR TO THIS PLANT. PROCEDURE NUMBER 20.00.001 REGULATES RELEASING INFORMATION BY OPERATING PERSONNEL TO VISITORS OR INSPECTORS OF CITIES SERVICE FACILITIES. TO ENSURE AGAINST ENTRANCE OF UNAUTHORIZED AND UNQUALIFIED PERSONNEL, CITIES SERVICE REQUESTS THE FOLLOWING INFORMATION. YOUR COOPERATION WILL PERMIT THE RELEASE OF DESIRED INFORMATION WITHOUT UNNECESSARY DELAY.

NAME SIMPSON OSCAR A
LAST FIRST MIDDLE

BUSINESS ADDRESS P.O. Box 2088 SANTA FE
STREET OR BOX NUMBER TOWN
N.M. 87501
STATE ZIP CODE

ORGANIZATION REPRESENTING OIL CONSERVATION DIV.

PURPOSE OF VISIT OR INSPECTION? Inspection of plant facility for
upcoming discharge plan to be submitted to OCP

WHAT SPECIFIC AREA OF THE FACILITY DO YOU WANT TO INSPECT? ALL

UNDER WHAT AUTHORITY DO YOU MAKE THIS INSPECTION REQUEST? OIL CONSERVATION DIV
RULES + REGULATIONS

WILL SAMPLES BE TAKEN? NO IF SO, WHERE _____

DESCRIBE BRIEFLY EQUIPMENT USED TO TAKE SAMPLES, E.T., EXPLOSION PROOF OR NOT _____

NAME OF YOUR SUPERVISOR DICK STAMENTS + JOE RAMAY

YOUR SUPERVISOR'S TITLE WATER RESOURCE SPECIALIST

YOUR SUPERVISOR'S PHONE NUMBER 827 2534

PLANT NAME Burton Flats
 PLANT SUPERINTENDENT Chase R. Patterson

CITIES SERVICE COMPANY

BOX 300

TULSA, OKLAHOMA 74102

May 21, 1982

Mr. Joe D. Ramey, Director
Energy and Minerals Department
Oil Conservation Division
P. O. Box 2088
Santa Fe, N. M. 87501

RE: Discharge Plans for Abo, Burton Flats
and Bluit Plants

Dear Mr. Ramey:

In response to your letter dated May 7, 1982, Cities Service Company fully intends to comply with the provisions of Part 3 and other applicable parts of the Water Quality Control Commission Regulations adopted under the New Mexico Water Quality Act for our three New Mexico gas processing plants and intends to meet your October 4, 1982, deadline.

As indicated by our previous correspondence, these plants do not discharge contaminated water from our facilities; thus we thought that a discharge plan would not be required.

In order to meet your requirements, we shall proceed to formulate a discharge plan for each plant. We plan to properly sample our wastewaters as the first step in formulating our discharge plans for each of our plants as required in the regulations under Section 3-104. The sampling will be accomplished by June 25 and results will be available by July 21, 1982.

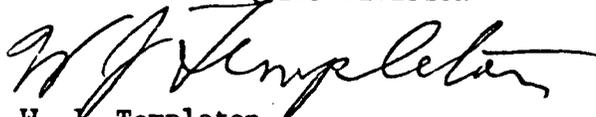
Review of the water analyses and assembling of the data will be completed and forwarded to your office for the required plans by October 4, 1982 as requested.

Your assistance in advising Cities Service Company of the discharge plan requirements and the laboratories available for testing has been greatly appreciated. We will proceed as expeditiously as possible to satisfy the regulatory requirements and will keep you informed with a monthly report of our progress.

Should you have any questions please call me at (918) 561-2641.

Very truly yours,

NATURAL GAS LIQUIDS DIVISION



W. J. Templeton
Measurement Manager

WJT/dg

cc: Mr. Oscar Simpson
Energy and Minerals Department
Oil Conservation Division

bcc: D. W. Kemp
K. G. McDonnell
D. V. Trew
D. F. Southard
D. G. Ellis
S. S. Innes

CITIES SERVICE COMPANY
BOX 300
TULSA, OKLAHOMA 74102

MAY 18 1982
SANTA FE

May 11, 1982

Mr. Oscar Simpson
New Mexico Oil Conservation Div.
P. O. Box 2088
Santa Fe, New Mexico 87501

Dear Mr. Simpson:

Subject: Bluitt, Abo and Burton Flats Plants
Discharge Plans

Cities Service would like to go ahead and get things in motion so that we may file discharge plans for our three New Mexico Gas Processing Plants as apparently required.

We need to know what specifically needs to be submitted in the plans, and especially what water quality parameters need to be sampled and tested. In our phone conversations of March 12 and March 30, 1982, you indicated that you would send us this type of information and also what laboratories were available and qualified in the area to run the required tests. We have not yet received this information.

Additionally, can you advise us of possible sources of information for our different sites on (a) ground water depths and compositions; (b) flooding potential and (c) rock depth and lithological description. We would certainly be most appreciative.

Sincerely,

NATURAL GAS LIQUIDS DIVISION



Steve Innes
Environmental Coordinator

SI:jk
G2/D/T

918 561-2498



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

May 7, 1982

Cities Service Company
 Natural Gas Liquids Division
 P.O. Box 300 (817-CSB)
 Tulsa, OK 74102

ATTENTION: Mr. Steve Innes, Environmental Coordinator

RE: Discharge Plans for Abo, Bluit,
 and Burton Flats Plants

Dear Sir:

The Oil Conservation Division (OCD) has been patient and lenient with Cities Service Company in regards to the non-submittal of discharge plans for Abo, Bluit and Burton Flats Plants. The OCD will require discharge plans to be submitted within 150 days from the date of this letter, with the due date designated as October 4, 1982. The OCD will not grant Cities Service Company any extensions of time beyond the October 4, 1982, deadline. Cities Service Company is advised to submit complete and in depth discharge plans in accordance to the accompanying OCD recommended discharge plan guidelines.

Cities Service Company is required to submit monthly progress reports for each plant outlining accomplishments or progress towards fulfilling the OCD guidelines of the WQCC regulations for a discharge plan.

If Cities Service Company fails to meet the October 4, 1982, final deadline, the OCD will take legal action under the provisions of the New Mexico Oil and Gas Act (Section 70-2-31) and the New Mexico Water Quality Act (Section 74-6-10). Violations of these Acts are punishable by civil penalties of up to \$1,000 per day for each day of each violation.

I request that you or other representatives of Cities Service Company demonstrate any solid reasons which you may have for your apparent disregard of the directions of the representatives of this agency and also provide to this agency a firm commitment to the October 4, 1982, deadline. This request for firm time frame commitment is necessitated by the failure of Cities Service Company to submit discharge plans on previously established deadlines. (Refer to photo copies of previous correspondence.)

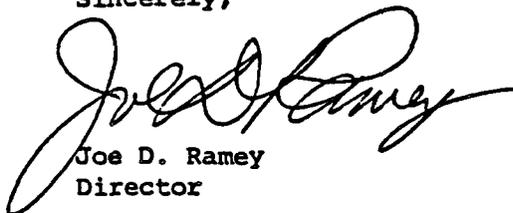
cc *list*
Att: Innes

cc DW Kemp
 WJ Templeton
 RW Bonnell
 DF Southard
 DG Ellis
 KG McDonnell
 JS Eliot

7, 1982

Thank you for your prompt attention to this matter. If you have any questions regarding this letter, please do not hesitate to contact me or Oscar Simpson at (505) 827-2534.

Sincerely,

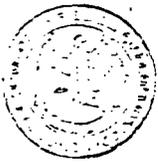


Joe D. Ramey
Director

JDR/OS/dp

Enc.

Letter received 5/17/82



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

May 7, 1981

Cities Service Company
Box 300
Tulsa, Oklahoma 74102

Attention: Mr. R. H. Willison

Re: Cities Service Company
Abo and Burton Flats
Plants Discharge Plan

Gentlemen:

In response to your letter dated May 1, 1981, the Oil Conservation Division feels that a discharge plan as outlined in the Water Quality Control Commission Regulations particularly Part 3, Water Quality Control is required of Cities Service Company Abo and Burton Flats Plants and within the time limit of Section 3-106A.

The proposed discharge plans should be comprehensive and specific in all areas as outlined in Sections 3-106 (c) and 3-107.

Enclosed is a copy of Division Order R-3221-C and Specifications for the Design and Construction of Lined Evaporation Pits which will help clarify part of our telephone conversation of May 7, 1981.

If you have any questions or need any additional information please call me or Joe Ramey (Division Director) at (505) 827-2534.

Sincerely,

OSCAR A. SIMPSON III
Water Resources Specialist

OS/og
Encl.

3-12-82

Called 9:45 AM Citrus Service Co
Natural Gas Liquids Div.
Steve Innes
Environmental Coordinator
P.O. Box 300 817 CSB
Tulsa OK La 74102
PH 918-561-2498

Informed him haven't received DP for
Abo Plant
Bluit Plant
Burston Flats Plant

- will send revised WQCC regs, letters of
explanation, & list of labs.

- Warned of serious mess of not sending DP

CITIES SERVICE COMPANY

BOX 300

TULSA, OKLAHOMA 74102

May 1, 1981



Mr. Joe D. Ramey, Director
New Mexico Energy and Minerals Department
Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87501

Re: Cities Service Company
Abo and Burton Flats Plants
Discharge Plan

Dear Mr. Ramey:

In response to your letter dated April 9, 1981, Cities Service Company does not feel that a discharge plan as outlined in Section 1-101.1 of the New Mexico regulations, should be required for either the Abo or Burton Flats gas processing plants.

It is our understanding that a discharge plan is required for plants which have effluent discharges or leachate which may move directly or indirectly into the ground water. The ground water could not be contaminated from either of these locations since the effluent from both plants is discharged into evaporation lagoons which are lined with reinforced neoprene.

If you have any questions or need additional information, please contact me or Mr. W. J. Templeton at (918) 561-2498 or 561-2641.

Very truly yours,

NATURAL GAS LIQUIDS DIVISION

R. H. Willison
Environmental Coordinator

RHW:c1

Stent
Edie Jones 561-2498



STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

LARRY KEHOE
SECRETARY

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-2434

April 9, 1981

Cities Service Company
Box 300
Tulsa, Oklahoma 74102

Re: Request for Discharge Plan

Gentlemen:

Under the provisions of the regulations of the Water Quality Control Commission you are hereby notified that the filing of a discharge plan for Cities Service Company's Abo Plant (15-17S-27E) and Burton Flats Plant (14-20S-28E) 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 discharges 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 time period is sought and approved.

The discharge plan should be prepared in accordance with Part 3 of the Regulations. Due to a recent court decision references to "toxic pollutants" may be ignored.

If there are any questions on this matter, please do not hesitate to call me or Oscar Simpson at 827-3260. Mr. Simpson has been assigned responsibility for review of all discharge plans.

Very truly yours,

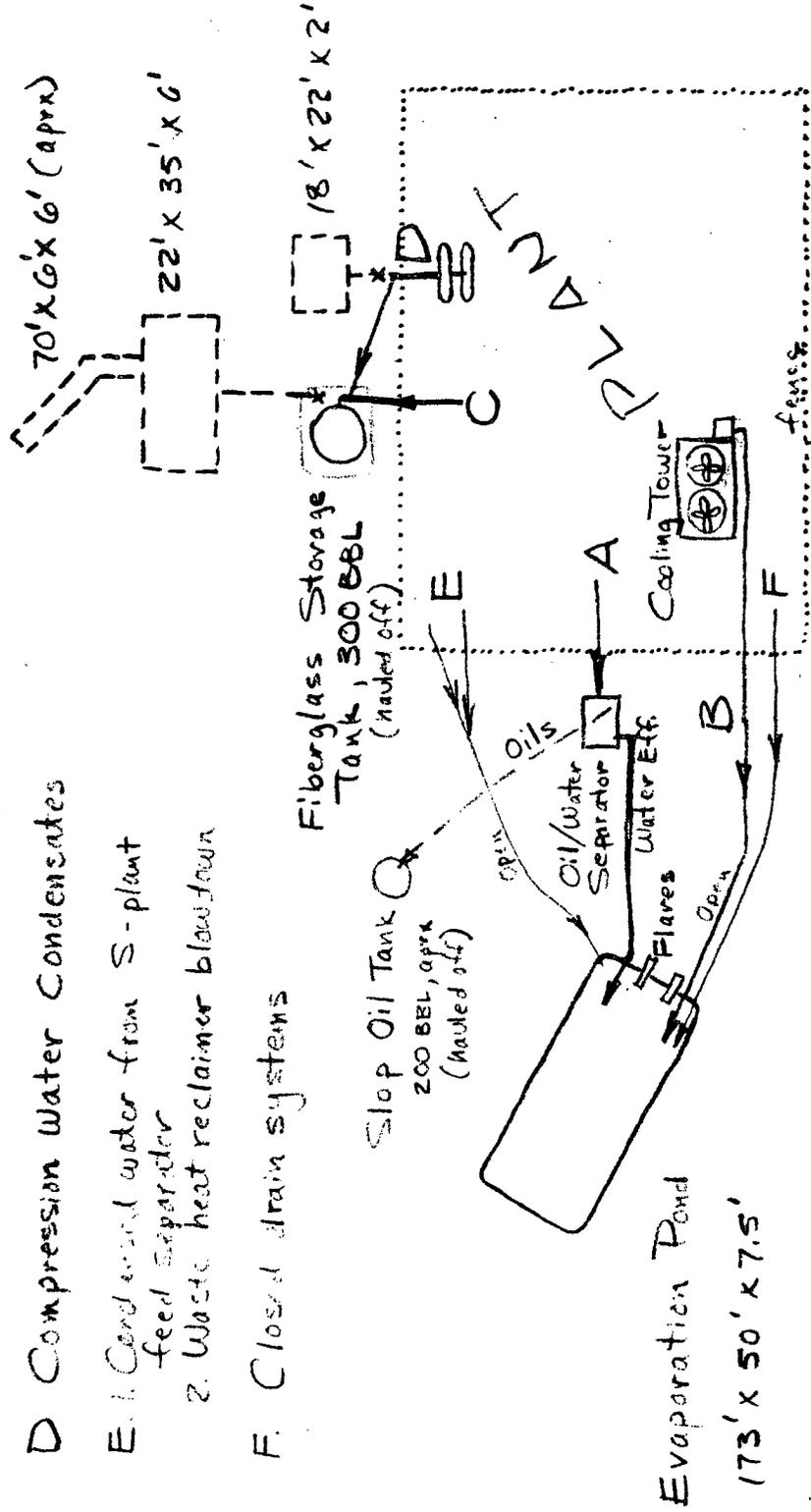
JOE D. RAMEY
Division Director

JDR/OS/og
enc.

cc: Oil Conservation Division - Hobbs
Cities Service Co. Abo Plant, P. O. Box 158, Artesia
Cities Service Co., Burton Flats Plant, P. O. Box 939
Carlsbad, N. Mex. 88220

□ = Eliminated Pits

- A. Process Area Drains
(open gravity drains)
- B. Cooling Tower Blowdown
- C. Spent Caustic (Sodium sulfite)
- D. Compression Water Condensates
- E. 1. Condensed water from S-plant
feed separator
2. Waste heat reclaimer blowdown
- F. Closed drain systems



Evaporation Pond
 173' x 50' x 7.5'



STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

LARRY KEHOE
SECRETARY

February 9, 1981

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-2434

Mr. R. H. Willison
Cities Service Company
Box 300
Tulsa, Oklahoma 74102

Dear Mr. Willison:

As requested in your letter of January 27, 1981, an extension of 120 days, in which to file your discharge plan, is granted.

It is my understanding that some changes in your discharge have been accomplished and that others will be done and a plan submitted prior to the expiration of the 120 days.

Yours very truly,

JOE D. RAMEY
Director

JDR/fd



STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

LARRY KEHOE
SECRETARY

October 29, 1980

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-2434

Mr. R. H. Willison
Environmental Coordinator
Natural Gas Liquids Division
Cities Service Company
Box 300
Tulsa, Oklahoma 74102

Dear Mr. Willison:

We have received your letter of October 24, 1980,
concerning your request for an extension of 90 days.

The information Cities Service Company submitted
shows good cause why the Oil Conservation Division
should grant a time extension. The due date is hereby
extended to January 27, 1981.

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