GW - 27

GENERAL CORRESPONDENCE

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FACILITY WASTE MANAGEMENT PLAN- New Mexico

MANAGEMENT SUMMARY

Knowing what your waste is, where it is, and how it's managed may seem insignificant and unimportant. However, each of us must realize that waste management is an integral part of our facility operation. Improper management of our wastes may adversely impact human health and the environment, lead to future liability, or result in lost revenues. With the help of this Plan and your participation, waste management will become an integral part of our daily activities.

PURPOSE

This Plan will help you identify, locate, manage and track your wastes. It has been designed as a working document that will be updated as needed. All facilities in the same state will have the same basic Plan, which will facilitate updating. In addition, the Plan is organized to be user-friendly. Waste stream identification sheets are arranged alphabetically in Section 5.

This Plan is part of Dynegy's overall Waste Management Program and will enable Dynegy as a whole to better understand and manage its waste.

INTRODUCTION

There are three major steps in handling waste at your facility.

Step 1 is to determine if you have a waste and then find out what kind of waste you have. To determine this you must sample and classify the waste. This step is detailed in Sections 4, 5, 6 and 12.

Step 2 is to properly store the waste prior to disposal and then use an authorized transporter and disposal facility to handle the waste. This step is detailed in Section 8.

Finally, ***Step 3*** is required to ensure that complete and proper records of the handling of the waste from "cradle to grave". Sections 9, 10, and 11 contain different types of record keeping instructions and forms to keep accurate records.

This Waste Management Plan is divided into 15 sections:

Section 1 contains a Management Summary of the plan contents,

Section 2 contains a statement of management approval by the facility.

Section 3 contains a summary training guide that contains a discussion of the purpose and scope of the plan and provides an overview of waste management. Waste minimization, recycling, and solid and hazardous waste definitions are discussed to provide the reader with a basic understanding of how the regulations that affect waste management work.

Section 4 contains detailed guidance on how to classify waste. Also included is information that pertains to natural gas waste and the RCRA exemptions for Oil & Gas waste.

Section 5 is the largest part of the plan and includes a Waste Identification Sheet for each waste stream generated at Dynegy facilities. The Waste Identification Sheet presents information on waste classification, minimization, handling, and disposal.

Section 6 contains guidance on how to sample waste streams and prepare for storage and shipment.

Section 7 contains guidance on storage and disposal of waste. The information includes how to store waste in various containers and the proper shipping requirements to dispose of the waste.

Sections 9 through 11 contain instructions and blank forms to maintain proper records of waste. They include a Facility Waste Inventory, Facility Waste Management Summary, Facility Shipment and Disposal Log and a Facility Waste Drum/Container Log Sheet.

Section 12 contains copies of significant State agency regulations that apply to waste in the particular state. Applicable forms and instructions are included.

Section 13 contains names, addresses and phone numbers of applicable State Agencies that handle waste approvals.

Section 14 contains an excellent guidebook on "How To Recognize a Hazardous Waste". This user-friendly book will be of benefit in understanding the complex process dealing with waste.

Section 15 contains a floppy disk that contains Excel spreadsheet files of the internal forms detailed in Sections 9 through 11.

WASTE MANAGEMENT PLAN - New Mexico

FACILITY MANAGEMENT APPROVAL

This Waste Management Plan has the full support and approval of the management at this facility

Tim Jordan
Area Manager

2/15/00
DATE

Cal Wrangham
ES&H Advisor

2/17/2000
DATE

TRAINING GUIDE

PURPOSE AND SCOPE

The management of wastes generated at gas processing facilities has become increasingly complex; new regulations are promulgated so quickly it is practically impossible to keep up with them. Waste handling and disposal techniques that were acceptable yesterday are no longer allowed today. Facility personnel must comply with a myriad of agency notifications, testing requirements and recordkeeping requirements. This waste management plan is designed to provide guidance in the management of wastes generated at the facility by ensuring their proper storage, transportation, and disposal. Specifically, this plan will provide the following information:

- Waste identification, classification, handling, and disposition.
- Waste minimization and elimination alternatives.
- Information on applicable shipping requirements under the Department of Transportation
- Examples of forms and letters necessary for disposal and reporting requirements.
- Data on how each facility is managing waste and the associated costs.

This information will make it possible to meet the following goals:

- Facilitate proper waste identification and management by plant personnel.
- Involve plant personnel in identifying ways to reduce waste generation.
- Comply with regulatory requirements for developing and implementing a plan to minimize waste generation.
- Increase awareness and provide training to plant personnel.
- Provide a means for inter-facility communication and transfer of technology.

The scope of this plan covers all wastes generated at the facility which meet the Resource Conservation and Recovery Act (RCRA) definition of a "solid waste" and does not include the following:

- Wastes which are discharged into and remain as part of the atmosphere (i.e., fired equipment exhaust, relief valve discharges, flare emissions, incinerator emissions, etc...).

- Wastes which are discharged through an effluent system which is covered under an NPDES or State permit (i.e., boiler and/or cooling tower blowdown, sewage treatment facility effluent, stormwater runoff, etc...).

WASTE MINIMIZATION

The primary emphasis of this Plan is on waste minimization; the reasons for this emphasis are:

1. A congressional mandate,
2. Savings to the company, and
3. Reduction in environmental liability.

Minimization is defined by the U. S. Environmental Protection Agency (EPA) as "the reduction, to the extent feasible, of waste generated prior to treatment." Congress established a national policy declaring the importance of reducing or eliminating the volume of hazardous waste generated as soon as possible. **As a result, industry is required by law to develop waste management plans and reduce the volume of waste generated each year (54 FR 25056-25057).** A second reason for emphasizing waste reduction

is the savings to the company. By eliminating a waste stream, it is no longer necessary to devote resources to the handling, storage, analysis, and disposal of that waste stream. Finally, the environmental liability that a company sustains is reduced each time a waste stream is eliminated.

Corporate policy on waste management options is, by order of preference,

1. reduction,
2. recycle/reuse,
3. treatment (including disposal).

Therefore, plant personnel should continually try to identify and evaluate possible waste management alternatives. Information can be obtained from a variety of sources including trade associations (such as the Gas Processors Association), published literature (from the American Petroleum Institute or industry publications), state and federal environmental agencies, and company personnel. Waste minimization may be something as simple as proper maintenance and operation of equipment to prevent generation of excessive volumes of waste, or using corrosion inhibitors in cooling tower water that do not contain chromium.

RECYCLING & REUSE

In situations where waste elimination or reduction may not be possible, recycling or reusing a material is the next alternative. If a material can be used more than once, the overall volume of material purchased and waste generated is reduced as well as disposal costs. Additionally, some states such as Louisiana require certain wastes be recycled instead of disposed. Finally, the following recyclable materials are excluded from hazardous waste regulation:

- Used oil that is recycled in some other way than burning for energy recovery.
- Scrap metal.
- Used batteries returned for regeneration.
- Materials used or reused as ingredients to make a product.
- Wastes used or reused as effective substitutes for chemical products.
- Wastes returned to the original process from which they were generated.

The latter three are excluded only if the wastes are not reclaimed or treated before reusing (such as distillation, ion exchange, dewatering). A complete guide on recycling can be found in Section 14, How to Recognize a Hazardous Waste.

WHAT IS A SOLID WASTE?

The Solid Waste Disposal Act (SWDA) was enacted in 1965 to regulate the disposal of solid waste primarily at municipal landfills. The SWDA was amended in 1976 by the Resource Conservation and Recovery Act (RCRA) to include more stringent regulations of solid waste and a "cradle to grave" regulation of hazardous waste. Hazardous waste is monitored from the point of generation, through storage, transportation, and final disposal. However, the fundamental principle behind RCRA, as indicated in its title, is to minimize the volume of hazardous waste generated through elimination, reduction, or recycling and reuse of solid and hazardous waste and to avoid land disposal of wastes whenever possible. In an effort to promote waste reduction, land disposal restrictions were authorized when RCRA was amended in 1984. In order to understand the solid and hazardous waste programs some critical definitions must be understood.

A solid waste includes *garbage, refuse, sludge from a waste treatment plant, water supply treatment plant, air pollution control facility, and other **discarded** material including solid, liquid, semi-solid, or contained gaseous materials, resulting from industrial, commercial, mining and agriculture activities, and from community activities with the exception of domestic sewage, irrigation return flows, or industrial discharges permitted under the Clean Water Act (Title 40 of the Code of Federal Regulations Part 261.2 (40 CFR 261.2))*. A material must first be discarded to become a waste. **Discarded** is defined as "*any material which is disposed, abandoned, recycled or considered inherently waste-like (40 CFR 261.2(a)(2))*." Several categories of materials are exempt from regulation as solid waste. Two of these exemptions important to the gas processing industry include:

- Industrial wastewater discharges permitted under the Clean Water Act.
- Secondary materials that are reclaimed and returned to the original process from which they were generated.

WHAT IS A HAZARDOUS WASTE?

Hazardous waste is actually a subset of solid waste; discarded material cannot be a hazardous waste unless it first fits the definition of a solid waste. There are two types of hazardous waste as defined in RCRA (40 CFR 261.3), 1) characteristically hazardous, and 2) listed hazardous wastes. Wastes that are characteristically hazardous exhibit one of the following four characteristics: ignitability, corrosivity, reactivity, or toxicity. An ignitible waste is any solid, liquid or compressed gas with a flashpoint less than 140° F such as Varsol (40 CFR 261.21). A corrosive waste is any liquid that has a pH less than or equal to 2, or greater than or equal to 12.5 such as spent acid or spent caustic (40 CFR 261.22). Reactive wastes are those that are normally unstable, react violently with water (sometimes releasing hydrogen sulfide (H_2S) or cyanide (CN), if present in the waste, as gases), form potentially explosive mixtures with water, are capable of detonation or explosion reaction if subjected to a strong initiating source or heated under confinement, capable of detonation or explosive decomposition or reaction at standard temperature and pressure, or meets the DOT definition of forbidden explosive (40 CFR 261.23). Cooling tower sludge might be a reactive waste due to its potential to contain hydrogen sulfide. Toxic wastes contain concentrations of regulated metals (arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver), organic compounds (26 compounds including benzene and trichloroethylene), and insecticides/herbicides above allowable limits (40 CFR 261.24). For example, soil in meter sheds are sometimes toxic due to elevated concentrations of mercury.

Listed wastes are those which have been identified as "typically or frequently" hazardous because they exhibit a characteristic or they threaten human health or the environment. Listed wastes include material used in non-specific sources such as spent solvents (40 CFR 261.31), from specific processes such as API separator sludge from refining (40 CFR 261.32), commercial chemical products that are off-specification species, or are container or spill residues such as methanol (40 CFR 261.33).

As with the definition of a solid waste there are several exemptions to the definition of hazardous waste. Among the several categories of exempt waste are two that are particularly important, the exclusion of household waste, and the exclusion of drilling fluids, produced waters, and other wastes associated with the exploration, development, and production of crude oil, natural gas, or geothermal energy (known as the petroleum exclusion). The exemption is important because it explicitly states that certain wastes unique to the exploration and production of natural gas and oil are exempt from consideration as a hazardous waste. Therefore, the wastes do not have to be tested to determine if they are hazardous and they can be handled as a solid waste. Many states including Louisiana and Oklahoma have put some limits on the full interpretation of this exemption. In these states, the environmental agencies require these wastes to be tested before they can be disposed in a landfill permitted by that agency. The benefit of this exemption is evident in the disposal of aqueous wastes such as spent amine or cooling tower blowdown in

a Class II disposal well. Because of the complexities, it is important to review the exemption and state requirements (review the memorandum of understanding between the agencies). A copy of the book How to Recognize A Hazardous Waste (Even If Its Wearing Dark Sunglasses) has been included in Section 14 as an additional resource. The book provides an complete analysis of the hazardous waste regulations.

WHO IS A GENERATOR OF HAZARDOUS WASTE?

A generator is "any person, by site, whose act or process produces hazardous waste or whose act first causes a hazardous waste to become subject to regulation." There are three types of generators of hazardous waste; each category is defined by the quantity of waste generated and has specific requirements that must be met (40 CFR 262).

A large quantity generator (LQG) produces more than 1,000 kilograms per month (kg/mo), or 2200 pounds per month (lbs/mo), of hazardous waste. Large quantity generators must comply with the following requirements:

- Obtain an EPA Identification number.
- Store waste onsite for no more than 90 days.
- Manifest the transport and disposal of each waste shipment and comply with all Department of Transportation (DOT) shipping requirements.
- Wastes must be disposed at RCRA-permitted facilities.
- Comply with specific storage requirements.
- Provide complete training for personnel handling wastes.
- Maintain a complete contingency plan.
- Comply with reporting and recordkeeping requirements.

A generator that produces more than 100 kg/mo, or 220 lbs/mo but less than 1,000 kg/mo of hazardous waste is defined as a small quantity generator (SQG). Generators in this category must comply with the following requirements:

- Obtain an EPA Identification number.
- Store no more than 6,000 kg (132,000 lbs) onsite at any time for up to 180 days or up to 270 days if the disposal site is more than 200 miles away.
- Manifest the transport and disposal of each waste shipment and comply with DOT shipping requirements.
- Wastes must be disposed at RCRA-permitted facilities.
- Comply with specific storage requirements.
- Provide basic training for personnel.
- Maintain a basic contingency plan.

A conditionally exempt small quantity generator (CESQG) produces no more than 100 kg/mo (220 lbs/mo) of hazardous waste or no more than 1 kg/mo (2.2 lbs/mo) of acutely hazardous waste and accumulates no more than 1,000 kg of hazardous waste on site at one time. Conditionally exempt generator's hazardous wastes are not subject to many of the requirements that larger generators must meet. They do not have to obtain an EPA Identification number (although most transporters and disposers will not accept waste without a number), manifest waste shipments, provide training to personnel, maintain contingency plans, or comply with storage requirements. However, they must send their hazardous wastes to disposal facilities authorized to accept that waste (40 CFR 261.5). Generators producing less than 100 kg/mo in Louisiana are termed Small Quantity Generators and are required to use shipping manifests, comply with recordkeeping and reporting requirements. Texas, Oklahoma, and New Mexico follow the federal program for CESQGs.

STORAGE PRACTICES

Facilities which store waste prior to disposal should follow a few simple best management practices to ensure wastes are stored in an appropriate manner. Following these practices can also reduce environmental liability caused by spills or leaks from storage containers. These practices include the following:

- Store wastes in containers or tanks that are in good condition.
- Containers should be compatible with the material being stored in them.
- Containers should be stored in covered areas and on impermeable surfaces whenever possible.
- Containers should be always be closed unless the contents are being transferred.
- Always label containers, identifying the contents and the start date of accumulation.
- Never allow accumulation of waste onsite longer than is absolutely necessary.
- Inspect storage areas and containers periodically (at least weekly for LQG and SQG) to ensure they are not leaking.
- Replace or repair immediately any container that is leaking.

RECORDKEEPING

Facilities that generate both hazardous and nonhazardous waste should always maintain records that document waste management practices at their facility. Maintaining copies of records serves four purposes. First, large and small quantity generators are required by regulation, for example, to keep copies of manifests for three years. Second, a generator, whether a CESQG or LQG, must maintain copies of records to document compliance with regulations such as waste analysis, classification, storage, transportation, and disposal practices. These records can be requested by a regulatory agency for review when conducting an inspection of the facility. Third, generators may be subject to monthly, quarterly, or annual reporting requirements including information such as type and volume of waste generated, the transporter, and treatment, storage, or disposal site must be provided to state or federal regulatory agencies. Fourth, maintenance of records can help to determine how effectively the goals of the waste management plan are met. The type of records that should be retained include the type and quantity of waste generated; waste manifests, bills of lading, or run tickets; names, addresses, and contact person for transporters and disposers; any results of waste analysis including how and where samples were collected. It is the responsibility of the generator to be sure that transporters and treatment storage and disposal facilities utilized are registered or certified with the appropriate state and/or federal agencies for those activities. This can minimize the possibility of illegal disposition of wastes generated from the facility.

WASTE SAMPLING AND ANALYTICAL PROCEDURES

The majority of states require that facilities sample and analyze some or all wastes generated at a facility. Different states have different requirements on the number and type of samples that must be collected as well as which specific analytical procedures should be used.

Before collecting samples it is important to ask a few basic questions. What parameters am I trying to analyze? What type and quantity of sample do I need? How and where do I collect the sample? What type of analytical procedure will I use? The answers to these questions will determine how the samples are collected, preserved, and how quickly they must be analyzed. **It is important to coordinate**

sampling activities with a laboratory prior to sample collection. Laboratory personnel can provide assistance with these questions and others. They can also provide the proper sample and shipping containers.

When collecting samples, the facility should always follow proper sampling procedures. Always clean and rinse the sampling equipment between sampling locations to prevent cross-contamination of one sample by another. Always place samples in a clean sample containers. Take great care when packing samples for shipment to the laboratory so that containers are not broken or punctured. Always document the sample locations in a field notebook, and be sure to label the sample containers with the sample identification, the time and date collected, and specify the analytical method to be used. Proper chain-of-custody procedures should be followed to be sure samples have not been tampered with while in transit from the plant to the laboratory. If samples are not handled properly, inaccurate analytical data can be the result.

The Environmental Protection Agency has outlined specific analytical procedures that should be performed when testing for specific compounds in SW-846 Test Methods for the Evaluation of Solid Waste, Physical/Chemical Methods. Each analytical test method has been assigned a test number which identifies the specific procedure to be used. In many cases, more than one test method can be used to analyze the same compound. For example, total petroleum hydrocarbons can be analyzed using Method 418.1 or Method 8015 Modified. Therefore, it is important to specify the correct analytical method. The specific test methods necessary for testing wastes are included on the Waste Identification Sheets (Section 5).

WASTE MANAGEMENT AND CLASSIFICATION

Waste Classification

The Hazardous Waste Management System was promulgated by the EPA in response to requirements levied by the Resource Conservation and Recovery Act (RCRA). This act, as codified in 40 CFR, lists those substances considered as hazardous. It provides lists of chemicals, pollutants, wastes and the like that are to be monitored, reported, controlled, or eliminated, if present in the workplace or the general environment. There is not an all encompassing list that can be used. The Environmental Department does monitor the lists published by the EPA and the hazardous materials as identified in Material Safety Data Sheets (MSDS) received from chemical manufacturers and distributors used by NGC Warren.

Before disposing of used chemicals, solvents, filters, drums, or other solid or liquid wastes, check to be certain that it is not a listed substance or that the MSDS received on the substance does not identify it as hazardous due to its characteristics. Contact the Environmental Department if you are unsure of the category of the waste or if you do not know what the substance is. If you do not recognize the term SQG, you are not alone in that regard. Many firms that generate hazardous waste are not familiar with this term. The law that gave rise to the term, or the multitude of requirements that the government imposes on generators of small quantities of hazardous waste.

Small Quantity Generators

SQG's generate between 100 and 1,000 kilograms (kg) of hazardous waste in any calendar month, which translates to between 220 and 2,200 pounds. That's roughly equivalent to between one-half and five 55-gallon drums, or between 25 and 300 gallons. That amount of hazardous waste monthly is the federal government's definition of a small quantity generator (SQG). Many states' definitions of the SQG are even more restrictive, which is why we have included as much state-specific regulatory information as is practically possible.

Defining a Hazardous Waste

It's likely that your facility uses hazardous chemicals of some kind often easily identified Hazardous as such because the vendors selling them also supply the chemicals' material safety data sheets (MSDSs).

Operations involving such chemicals often result in wastes such as spent chemicals, stained rags, or contaminated filters. When those wastes pose a potential danger to the environment or human health and life, they are considered hazardous wastes.

The regulations focus on four specific dangers. These are:

1. **Ignitability** - the property of being easily set aflame by nearby heat sources;

2. **Corrosiveness** - the capability to bum eyes or skin on contact;

3. **Reactivity** - the tendency for a substance to explode or otherwise react violently if exposed to air, water, or other common substances; and

4. **Toxicity** - meaning poisonous if taken into the body.

Wastes are considered hazardous if they exhibit any of these characteristics or if they appear on certain government lists.

Because they are hazardous, these wastes must be accounted for, constantly tracked and reported on, and handled with "kid gloves," from "cradle to grave" from the point of generation to the moment they are incinerated, treated, recycled, or landfilled.

The law that governs this "cradle-to-grave" tracking system and that imposes requirements on businesses, large and small alike, is called the Resource Conservation and Recovery Act (RCRA). This is also the law under which the category of "small-quantity generator" was created.

To find out if you are subject to the provisions of RCRA, you need to:

Start With The Right Question

Under RCRA, firms whose operations create hazardous waste are classified as one of three types of "generators"— based on the quantity of waste they generate.

The federal government's categories are:

1. Conditionally exempt generator,
2. Small-quantity generator, and
3. Large-quantity generator.

Again, some states have their own categories.

To determine which category of hazardous waste generator your facility falls into and what requirements you must meet you must answer two questions:

1. Is the waste you generate hazardous, under the law? and
2. Knowing the amount of hazardous waste you generate, which of the three compliance categories describes your business?

In determining the amount of hazardous waste generated, it is easy to become confused because the law defines quantity limits expressed in pounds or kilograms, while companies measure their waste in terms of gallons or gallon-rated containers, e.g., drums. The following chart helps you visualize how much waste we are talking about.

Conversion Chart

KILOGRAMS	POUNDS	GALLONS	55 GAL.
100 kilograms	220 pounds	30 gallons	one-half
1,000 kilograms	2,200 pounds	300 gallons	five
6,000 kilograms	13,200 pounds	1,800 gallons	thirty

If You're Unsure Whether Your Waste is Hazardous

The critical decision of whether your waste is hazardous is based on your special knowledge of the waste. Some wastes such as certain spent solvents are easily classified as hazardous. Yet, other wastes such as solvents that are not readily flammable, oils that may be contaminated with toxic metals, or chemical by-products may have to be tested to determine if they are hazardous.

Generator Responsibilities

It's important to note that under the law, you are presumed to know what your waste contains and are able to support any conclusions you reach. The generator category into which you fall is based on your adding up the weight of all the hazardous wastes your facility generates during the month. The compliance requirements vary markedly depending on how much waste you generate.

Note at this point, however, that the following *are federal* RCRA requirements. Some state requirements vary.

Conditionally Exempt Compliance Requirements (0- 100 kg/month)

The government recognizes that generators of very low quantities of hazardous waste are often smaller firms with limited resources. They have therefore allowed firms that generate between 0 and 100 kg (0 to 220 pounds) of hazardous waste per month to be "conditionally exempt" from certain federal regulations governing hazardous waste disposal, if they fulfill the following requirements:

- Fully identify all hazardous waste they generate;
- Send their waste to a waste facility approved by the state or RCRA-authorized facility; and
- Never accumulate more than 1,000 kg (2,200 pounds) of hazardous waste at any single time.

SQG Compliance Requirements (100-1,000 kg/month)

Those firms that generate between 100 and 1,000 kg (220 and 2,200 pounds) of hazardous waste, however, come under additional regulation by the EPA. Under the federal law, SQGs must:

- Fully identify all hazardous waste they generate;
- Obtain a U. S. EPA Identification Number,
- Send their waste to a hazardous waste facility, or other facility approved by the EPA or state to receive such waste;
- Use a hazardous waste manifest form when shipping waste off-site;
- Offer waste only to a hazardous waste transporter that has a U.S. EPA Transporter Identification Number,
- Comply with applicable Department of Transportation (DOT) requirements for shipping wastes off-site;
- Accumulate waste on-site for no more than 180 days, or 270 days if the waste is being shipped more than 200 miles—unless a hazardous waste storage permit is obtained;
- Never accumulate more than 13,200 lbs (expressed as 6,000 kg in the law) of hazardous waste at any single time; and
- Comply with emergency preparedness requirements.

Large-Quantity Generator Compliance Requirements

The requirements are most stringent if you are a "large-quantity" generator. For those facilities generating greater than 1,000 kg (2,200 pounds or 300 gallons) of hazardous waste per month, you must also:

- Certify on the manifest form that you have a program in place to minimize the volume and toxicity of your hazardous wastes;
- Accumulate waste on-site for no more than 90 days, unless a hazardous waste storage permit is obtained;
- File a biennial report with the EPA and an annual report with the state environmental agency, if applicable;
- Comply with annual RCRA training requirements; and
- Develop and maintain an emergency response "contingency plan."

Under the law any facility that produces or manages a waste must evaluate that waste to determine if It s hazardous.

Are your Wastes Hazardous?

The law's definition of the term "hazardous waste" is quite specific and can be boiled down to one key definition and four words:

A hazardous waste is a discarded substance that is either:

(1) ignitable, (2) corrosive, (3) reactive, or (4) *toxic.*

For example, a hazardous waste can be a solid, liquid, or containerized gas. "Discarded" may mean land-disposed, incinerated, burned, recycled, and even stored. The potential universe of hazardous wastes is limitless. Some substances are mentioned by chemical name. Most are not. Unnamed wastes, such as "spent solvents, "sludges," and "by-products," for example, that exhibit one of the four hazard characteristics mentioned above, are regulated as hazardous.

First, though, you need to thoroughly understand the issues involved with hazardous waste determination.

Here's the logic you should follow in building that understanding:

- Are You a Typical SQG?
- Have You Conducted a Waste Inventory?
- Have You Assembled Raw Material Data?
- What Exemptions are Available?
- Is the Waste Listed?

- Does the Waste Exhibit a Hazardous Characteristic?
- Are You Obeying all the Rules?

Question 1: Have You Conducted a Waste Inventory?

For most SQGs, the easiest inventory approach is to ask production and maintenance personnel about wastes, tour your production and nonproduction areas, and inspect storage areas and dumpsters.

It is important to identify: (1) what wastes you generate, (2) the quantity you generate, and, ultimately, (3) how you discard the wastes.

To help you to inventory your wastes, use the form found in Section 8 of this manual and list your wastes by name and quantity:

You can then proceed to determine what wastes on the list are hazardous.

Question 2: Have You Assembled Data on Your Raw Materials?

Since wastes usually begin with the raw materials you use, information on those materials will greatly assist you in understanding whether your wastes are hazardous.

Often, the right phone call or a look at the appropriate information sheet may rule out the need to have your wastes analyzed by a laboratory. If the raw material was considered a hazardous substance, the waste it creates will likely be so as well. Hazardous waste characterization information may be available from your trade association, your chemical vendor, or your waste hauler.

Such information may also be available on the material safety data sheets that came with many of the materials. You should receive (or you must generate if you are a chemical manufacturer) and keep on file an MSDS for every chemical product that you have on your premises for commercial use.

These sheets are invaluable in providing information about the physical, chemical, and toxic properties of the material.

An MSDS can greatly simplify the process of identifying the characteristics of your chemical waste. It can also save you money by eliminating the need for expensive first-time chemical analysis. Be forewarned, however, that you must always scrutinize any MSDS, making sure that the information it contains is accurate and sufficiently detailed. If there is any question, call the supplier listed on the sheet.

At a minimum, an MSDS will give you information on the hazards or risks associated with the hazardous substance. This includes: (a) the potential for, explosion, corrosivity, and reactivity; (b) the acute and chronic health effects resulting from exposure, including any medical conditions that might be aggravated by exposure; (c) the potential routes of exposure via skin, inhalation, ingestion, etc. and (d) the symptoms of overexposure.

The MSDS will also provide a description of the specific potential health risks posed by a hazardous substance. This includes, but is not limited to, carcinogenic (cancer-causing), mutagenic (mutationcausing), teratogenic (fetus-damaging), or neurotoxic (nerve-damaging) effects.

If your waste stream is relatively simple, an MSDS may provide you with all the information you need to determine whether your chemical waste is hazardous.

Some waste cannot be evaluated using MSDSs. Short of expensive laboratory analysis, there are additional ways to determine if your waste is hazardous.

Question 3: What Are the Eligible Exemptions?

First, you need to see if your waste stream may be among a group of substances that are totally excluded from the regulations. Although we have not listed all the exclusions here, those that may be pertinent to SQGs include:

- Household refuse;
- Unusable paper, cardboard, and plastic scrap;
- Air emissions;
- Certain wastes containing chromium;
- Demolition debris
- Wastes left in the bottom of product storage tanks, as long as that residue is not removed from the tank;
- Wastes discharged to surface waters under a National Pollutant Discharge Elimination System (NPDES) permit;
- Fly ash and related waste from burning fossil fuels;
- Scrap metal, used lead-acid batteries, and waste oil ***that will be sent offsite for reclamation;***
- Waste remaining in the bottom of containers emptied through conventional means (e.g., pumping or pouring). This residue must measure no more than one inch, or constitute no more, in the case of a 55-gallon drum, than 3 percent by weight of the total capacity (1.65 gallons in a 55 gallon drum).
- Wastes managed in an elementary neutralization unit, a totally enclosed treatment unit, or a wastewater treatment unit.
- Arsenic-treated wood or wood products used as intended.
- Waste materials that are reclaimed and returned for use to the original process in which they were generated, provided that certain "closed-loop" recycling criteria are met (essentially, the wastes never leave the production loop).

If you think, but are not sure, that your wastes fit this group, call the state environmental agency.

Question 4: Is The Waste Listed?

A waste is *automatically* considered hazardous if it appears on any one of four lists of hazardous wastes contained in the RCRA regulations. Comprised of more than 400 substances, the lists—found in Subpart D of the regulations—include chemicals that exhibit one of the four hazard characteristics.

A chemical waste does not make one of these lists by accident. EPA follows strict criteria in making the determination of whether a particular substance should be listed. EPA is authorized to list classes of hazardous wastes (e.g., electroplating sludges), as well as named substances (e.g., acetone).

The listed wastes are known by letter identification, as follows:

F wastes. This category refers to generic waste streams found in a variety of industrial processes. Many SQGs generate F wastes; the short list includes cleaners and strippers, dry-cleaning solvents, spent paint wastes, still residues, cleaning and stripping tank solutions, plating bath solutions and sludges from electroplating operations, and sludges from pretreatment of wastewaters.

Examples
F002—Waste perchloroethylene
F005—Methyl ethyl ketone
F003—Acetone

K wastes. This category refers to specific industrial processes whose wastes are deemed hazardous, such as wastes from the manufacturing of certain chemicals, pigments, inks, explosives, and petroleum refining and steel finishing.

Examples
KOO 1—Bottom sediment sludge from the treatment of wastewaters from wood preserving, processes that use creosote and/or pentachlorophenol
K083—Distillation bottoms from aniline production

P wastes. This category refers to discarded chemical products or off-specification products containing certain acute toxic chemicals. This category includes many pesticides, toxic metals, and organic chemicals shown to be carcinogenic. Except for small chemical firms and pesticide formulators, few SQGs generate P wastes.

Examples
P05-Fluorine
P099—Potassium silver cyanide

U **wastes.** This category refers to discarded chemical products or off-specification products containing certain toxic chemicals. This list also contains many pesticides, toxic metals, and organic chemicals. As described above, few SQGs generate these wastes.

Examples
U037-chlorobenzene

U06 1—DDT

Special Note about Solvent Wastes

Many *solvents* are mixtures that contain one or more of the "listed" F-waste constituents. It is important to remember that only wastes derived from products containing 10 percent or more of listed solvents are hazardous wastes.

The 10 percent rule does not, however, apply to ignitable wastes (F003) because F003 solvent mixtures may be ignitable at concentrations below 10 percent.

F003 Mixtures should therefore be tested; if the wastes are no longer considered ignitable, they do not need to be classified as a RCRA hazardous waste.

Question 5: Does your Waste Exhibit a Hazardous Characteristic?

The "lists" are not exhaustive. Listing is only one of the ways in which regulated wastes are identified. In addition to all of the substances that are specifically listed in the regulations, any other wastes found to be ignitable, corrosive, reactive, or toxic are also hazardous wastes.

Let's look more closely at how the characteristics are defined (wastes identified as hazardous by characteristic carry the code "D"):

Ignitable. A waste is considered hazardous if it is easily combustible or flammable. Specifically, the wastes must have *a flash point of less than 140 F: A* solid waste is ignitable if it can burn spontaneously and burn persistently. Oxidizers are generally considered ignitable under this definition.

Examples
D00 1 -Spent mineral spirits
D001—Spent lacquers
D00 1—Spent Stoddard solvent

Corrosive. A waste is considered hazardous if it dissolves metals or other materials, or burns the skin. Specifically, the wastes must have a pH of 2 or less (acids) or a pH of 12.5 or more (bases or caustics).

Examples
D002—Spent sulfuric acid
D002—Spent naval jelly
D002—Spent strippers

Reactive. A waste is considered hazardous if it is unstable or undergoes rapid or violent chemical reaction, often explosion, with water or other materials. Reactive wastes also, under certain conditions, can release toxic vapors. Most SQGs will not encounter reactive wastes as often as those with other characteristics.

Examples
D003 - Waste hydrogen cyanide
D003 - Waste hydrogen sulfide

Toxic. A waste is considered toxically hazardous if it is poisonous or can cause cancer, mutations, illness, or death. This could include an enormous universe of chemicals, but it does not. The regulations currently contain a list of just 14 substances that, if present in an extract of the waste stream at threshold concentrations, render the entire waste stream subject to regulation as a hazardous waste.

Testing involves extracting the liquid portion of the waste in such a way that the procedure itself simulates landfill leaching. For this reason, the analytical method is often referred to as the Toxicity Characteristic Leaching Procedure (TCLP or "T-Clip") extraction test. Currently, EPA has set thresholds for 25 toxic constituents, but the Agency should soon finalize standards for many additional toxic metals, and organic and inorganic chemicals.

Examples
D004 Spent arsenicals
DOO 7/DOO Most paints with toxic metals (chromium, lead)
D008—Lead dross/scrap from batteries
DO 11—Spent silverplating waste

Question 6: Are You Complying With Two Special Rules?

At this point, you may be starting to realize that all of the above determination methods are based on the idea that you have, and can isolate, a single specific waste from one process. What if, as is often the case, several kind of wastes are thrown together, as in a single barrel in the comer, waiting for pickup? This turns what may have started out as waste oil (not a regulated substance in most states) into a hazardous waste which can greatly increase the quantity of hazardous waste you generate.

There are two additional rules that SQGs must understand. The first is called the "mixture rule," and the second, the "derived-from rule." Both are relatively easy to understand.

"Mixture rule." Unless permitted to do so by the EPA or the state hazardous-waste management agency, intentionally mixing a hazardous waste with a nonhazardous waste brings *the entire mixture* under regulation as a hazardous waste. For example, when contaminated solvent is mixed with waste oil in the same drum.

A notable exception to this "treatment rule" is altering pH. Check with your hazardous-waste management agency or local treatment plant concerning pH adjustments.

"Derived-from rule." This rule is even more basic:

Any waste derived from a *listed* hazardous waste is a hazardous waste.

An obvious example of this is the incineration of contaminated solvent, a hazardous waste, which leaves a sludge. The sludge was derived from the original waste so it too is hazardous.

In the case of *characteristic* waste mixtures, if the residue continues to exhibit one or more of the characteristics of the original substance, the waste is **classified as hazardous. Thus, the sludge, ash, dust, or leachate from** hazardous **waste reclamation** (e.g., **distillation stills), incineration, or** treatment may be fully regulated as a hazardous waste.

To determine whether your wastes are regulated, ask yourself:

1. Are they in the exempted list above?

2. Are they named on the EPA's lists?

3. If unnamed, do the MSDSs or other information (labels, brochures, spec sheets, correspondence, shipping papers) concerning the raw materials that created the wastes indicate one of RCRA's four hazardous characteristics?

4. Is the waste listed in the Warren Waste Management Plans waste data sheets?

Other Waste' Issues to Address

First, you should be aware that there is a subcategory of listed wastes referred to as "acutely hazardous. " These wastes are so dangerous, even in small amounts, that if you generate more than 1 kg (approximately 2.2 pounds) of these wastes in a calendar month, you are subject to all of the "large-quantity" generator requirements.

These wastes are primarily pesticides and are neither typically generated nor stored by SQGs.

Second, other wastes, must also be addressed—but not under RCRA. For example, wastes containing polychlorinated biphenyls (PCBs) at concentrations greater than 50 ppm are wastes whose disposal is regulated by the Toxic Substance Control Act (TSCA), and appropriate state regulations.

Brake pads and linings containing asbestos must also be disposed of properly. EPA regulations require that asbestos be disposed of in a doublewalled plastic bag marked "Asbestos." While some local landfills will accept these bags, it is increasingly common to have to pay for these wastes to be taken to a special commercial landfill.

Third, check the Warren Waste Management Plans data sheets to review additional wastes.

Summary Checklist

Learning to Identify Wastes as Hazardous

1. Assume that all wastes excluding household garbage and paper wastes are potential hazardous wastes.

2. Make a list of all discarded substances, including wastes that are burned, placed in the trash, or poured down the drain.

3. Ask for assistance. For general compliance and notification assistance, contact the Environmental Department

4. Determine which of your wastes are "listed" wastes by comparing your wastes to the lists found in Part 261.31-.33 of 40 CFR (RCRA).

5. Use MSDS information on the product label, lists in this document, and consultation with the Environmental Department, chemical vendors, or waste haulers to determine which wastes are probable "characteristic" wastes.

Other Hints

Once you have determined which wastes are "listed" and which wastes are probable "characteristic" wastes, your waste hauler or an independent EPA-licensed laboratory canperform a waste characterization on your wastes to answer any uncertainties.

Try to avoid unnecessary and expensive private laboratory analysis. Industry-specificwaste streams are generally similar and can easily be identified by a RCRA compliance expert.

Be sure to test any chemicals that could be contaminated with heavy metals.

Remember, ignorance of a waste's hazard characteristics is not a legal defense. Be sure to identify all hazardous waste streams.

Finally, no matter what the legal status of a waste, and even if it is "exempted" (e.g., lead-acid batteries destined for reclamation), remember that these remain substances dangerous to human health and the environment. Treat them as such.

Specific Help

In Section 5 of this manual, you will find charts of hazardous (and non-hazardous) wastes commonly generated by NGC natural gas and NGL facilities. The following paragraphs discuss wastes typically generated in the natural gas industry.

WASTES GENERATED IN EXPLORATION AND PRODUCTION OPERATIONS

GAS PLANTS

This section discusses the four primary operations associated with E&P activities: gas plants, production facilities, drilling and workovers It discusses operational and design aspects as well as wastes generated Companies may vary in their engineering design and operational practices, but they generally all utilize the technology and generate the wastes discussed in this section.

Natural gas plants provide centralized dehydration, compression and sweetening facilities necessary to place natural gas in marketable condition and to extract natural gas liquids such as ethane, propane and butane.

Natural gas streams entering gas processing plants vary in composition but methane usually is the predominant component, with smaller amounts of ethane, propane, butanes, pentanes, and heavier hydrocarbons. The raw gas may also contain compounds such as carbon dioxide, hydrogen sulfide, mercaptans, other sulfur compounds, water, and certain solid impurities. These compounds are removed in treating facilities. The treated raw gas then enters an extraction facility which produces residue gas and heavier natural gas liquids (NGLs) such as ethane, propane and butane.

Listed below are the five extraction and treating processes frequently performed in gas plants and the waste materials that may be generated from these processes.

INLET SEPARATION AND COMPRESSION

Gas is gathered from the field at the inlet of the gas plant. Here fluids such as produced water and liquid hydrocarbons are separated, and the gas, if necessary, is compressed to a sufficient pressure to allow the plant to operate. Wastes typically associated with inlet separation include produced water as well as pigging materials, inlet filter media, fluids from corrosion treatments, and small amounts of solid material (pipe scale, rust, and minor amounts of reservoir formation materials). Wastes generated from the operation of plant inlet compressors are the same as wastes generated from compressors used in field operations. These wastes include engine cooling water and used lubrication oil and filters.

Inlet separators should be designed to send the produced water and hydrocarbons into process vessels where hydrocarbons can be recovered for sale and produced water separated for disposal. Small amounts of pigging materials may be recovered at pig receiving traps andshould be disposed of properly.

For safety reasons, inlet separators are equipped with relief valves that vent to emergency containment. This occurs if a fluid slug reaches the plant that exceeds separation capacity or if gas pressure exceeds design capacity of plant facilities. Emergency pits are not disposal facilities and fluids vented should be recovered as soon as practical (generally within 48-72 hours) and disposed of properly.

The pits should be constructed in accordance with regulations. In the event natural gas is flared, these flare incidents may require reporting to air quality and oil and gas regulatory agencies depending on the composition and volume of the flare gas.

HYDRATION

All natural gas contains a certain amount of water vapor. Typically this water content must be reduced to meet sales pipeline specifications. Dehydration is the process of extracting water vapor to make the gas marketable. The processes used are identical to those used in field facilities where centralized dehydration at a gas plant does not occur.

Natural gas is dehydrated by contact with liquid or solid desiccants. Liquid desiccants such as ethylene, diethylene, or triethylene glycol absorb the water. Heat regeneration evaporates the water, and the glycol is recovered for reuse. With solid desiccant dehydration, natural gas flows through tower vessels filled with alumina, silica-gel, silica-alumina beads, or molecular sieve which absorb water vapor

Wastes generated during the dehydration process consists of glycol based fluids, glycol filters, condensed water, and solid desiccants. These fluids and solids may contain trace levels of hydrocarbons and treating chemicals.

SWEETENING & SULFUR RECOVERY

Some natural gas contains hydrogen sulfide, carbon dioxide, or other impurities that must be removed to meet specifications for sales pipeline and field fuel use. The process of sweetening may be conducted using units identical in operation to units used in field facilities where centralized sweetening facilities are unavailable or in dedicated sulfur recovery facilities where high hydrogen sulfide concentrations are present.

Sweetening primarily consists of lowering the hydrogen sulfide and carbon dioxide content in natural gas. Hydrogen sulfide is removed from natural gas by contact with amine, sulfinol, iron sponge, caustic solutions, and other sulfur converting chemicals. Heat regenerates amine or sulfinol for reuse. Iron sponge, caustic solutions, and other sulfur converting chemicals are spent in the process as hydrogen sulfide is converted to iron sulfide and other sulfur compounds.

Amine treating of natural gas for the removal of hydrogen sulfide and carbon dioxide is the process that is probably most widely used in industry.

This process is based on the reaction that aliphatic alkanolamines will react with acid gases at moderate temperatures, and that the acid gases are released at slightly higher temperatures.

The reactions for this process using aqueous monoethanolamine (MEA) and hydrogen sulfide are as follows:

$$2\,(HO\,CH_2 - CH_2 - NH_2) + H_2S \leftrightarrows (HO\,CH_2 - CH_2 - NH_3)\,2\,S + Heat$$

$$(HO - CH_2 - CH_2 - NH_3)\,2\,S + H_2S \leftrightarrows 2\,(HO - CH_2 - CH_2 - NH_2)\,HS + Heat$$

Wastes generated in amine sweetening include spent amine, used filter media, and acid gas which must be flared, incinerated or sent to a sulfur recovery facility.

In the iron sponge treating process, iron oxide reacts with hydrogen sulfide to form iron sulfide. Iron sponge is composed of finely divided iron oxide, coated on a carrier such as wood shavings.

The chemical reaction for the removal of hydrogen sulfide with the iron sponge treating process is as follows:

$3H_2S + Fe_2O_3 \nearrow Fe_2S_3 + 3H_2O$

The iron sponge process is generally used for treating gas at pressures less than 50 psig with total hydrogen sulfide content under 100 grains per 100 standard cubic feet. There is no limit to treating pressure; however, due to inherent gas velocity limitations through the treating bed, most high pressure applications are limited due to the economics of bed size and bed life. Wastes generated in the iron sponge process are iron sulfide and wood shavings.

Small volumes of hydrogen sulfide may also be removed from natural gas and NGLs by contact with a caustic solution which is reused until spent. Most caustic treaters utilize a 15 to 20 percent by weight sodium hydroxide solution wherein the caustic consumption is approximately 2.4 pounds per pound of hydrogen sulfide removed and 1.9 pounds per pound of carbon dioxide removed. Most caustic treaters consist of a simple vessel holding the caustic solution through which gas is allowed to bubble.

The chemical reaction for removal of hydrogen sulfide with caustic is as follows:

$H_2S + NaOH \nearrow Na_2S + 2H_2O$

The primary waste from caustic treating is spent caustic solution. Use of other sulfur converting compounds such as sulfa-check are employed in one-step processes for the removal of low levels of hydrogen sulfide. Here, a direct conversion occurs at ambient temperature that uses a single contact vessel. Natural gas bubbles through the vessel until the sulfur converting compound is spent. The spent material is a nonhazardous slurry of sulfur and salts.

Dedicated sulfur recovery facilities for high hydrogen sulfur content gas or high throughput facilities may use catalytic processes. Here, hydrogen sulfide is removed from sour natural gas using amine or sulfinol solutions.

As part of the regeneration process, hydrogen sulfide is driven out of solution. The hydrogen sulfide is then burned in the presence of oxygen to produce sulfur dioxide. A mixture of hydrogen sulfide and sulfur dioxide, when passed over a heated catalyst, forms elemental sulfur.

This process is known as the Claus process. It uses inert aluminum oxide, in pellet form, as a catalyst. The catalyst does not react in the sulfur making process. The aluminum oxide catalyst simply provides a greater surface area to speed and assist the process.

Molecular sieve absorbents are used to remove hydrogen sulfide, mercaptans, and heavier sulfur compounds from gases and NGLs. Simultaneous sweetening and dehydration may be accomplished in the same unit. Molecular sieve sweetening is a regenerable batch type operation which requires at least two beds for continuous processing. One bed is sweetening gas while the other is being regenerated.

Waste materials generated may include water vapor, which is vented, condensed or contained within the molecular sieve; regeneration gas which is used as a fuel source or recombined and sent to sales; and spent molecular sieve.

NGL RECOVERY

Gas plants provide centralized gas gathering services (such as compression, dehydration, and sweetening) and also recover NGLs which are hydrocarbons heavier than methane which exist as liquids at moderate pressures. NGL recovery is the process by which hydrocarbons such as butane or propane are extracted. NGL extraction may use either compression and/or cooling processes, absorption processes, or cryogenic processes. These processes either absorb heavier molecular compounds from the process stream with an absorption oil that is recycled or use temperature and pressure to separate fractions with different boiling points.

Wastes generated include lubrication oils, spent or degraded absorption oil, waste waters, cooling tower water, and boiler blowdown water.

Plant compression and utility systems (fuel, electrical generators, steam equipment, pump, and sump systems) are necessary to operate gas plants and to raise the pressure of plant residue gas to match sales gas pipeline pressure. Compressors are driven by electric motors, internal combustion or turbine engines. These engines, compressors and utility systems generate used lubrication oils, cooling waters, drips of lubrication and hydraulic oils, wastewaters, varsol used for cleaning equipment, and oily debris such as rags, sorbents and filters.

Liquid wastes should be disposed of via the plant sump system where wash waters, lubrication oils, cooling waters, etc., are typically collected via a series of sumps. Fluids are usually collected from the sumps into a central clarifier/classifier pit where waters are separated for disposal via Class II injection wells, NPDES discharge, or evaporation pits.

Hydrocarbons are recycled by returning them to sales streams or, if sales streams are not available, to waste oil collection and reclamation facilities.

Other solid wastes include filters, which should be disposed of in accordance with applicable regulations

SEPARATORS

Two phase separators isolate produced liquids from gases as they flow from the wells. Three phase separators, with additional float mechanisms, also separate produced water from liquid hydrocarbons and deliver gas, oil or condensate, and water to respective facilities for further processing or sale. The primary waste generated is bottoms, including sand and scale recovered during cleanout operations. A free-water knockout (F WKO) is a vessel which separates free water (water that is not linked to oil in an emulsion) from other produced fluids. Separated produced water then flows into a disposal or injection system. FWKOs are occasionally drained to remove solids and bottom sludges.

HEATER TREATERS

Heater treaters and/or electrostatic treaters separate emulsified oil and water. Occasionally, emulsions which cannot be successfully treated in a single pass ("bad oil") must be placed in a standby oil tank for recycling and further treatment. Produced water which is separated in the treaters goes to a disposal or injection system. As with the FWKO, these vessels are occasionally drained to remove solids and bottom sludges. Vessels which use hay or excelsior sections to absorb minute amounts of oil must be periodically cleaned out and the absorption material replaced.

FILTERS

To improve fluid and water quality, filters are frequently used. Filter media must be replaced or, if permanent, backwashed. Replaceable filters include sock, cartridge, or canister units. Permanent filters may use diatomaceous earth or granular media such as sand or coal.

Permanent filters are periodically backwashed with fresh or produced water sometimes containing a small amount of surfactant. Backwash is circulated to a solids treatment and disposal system where the backwash liquid is then usually returned to the production facilities for reprocessing.

GAS FLOTATION VESSELS

Another type of treatment system utilizes gas flotation. These units are sometimes used to remove small concentrations of insoluble oil and grease from produced water. The units agitate the water by injecting a gas, usually natural gas or air, through the liquid stream. This action flocculates the suspended oil, grease, and dirt. The flocculated materials rise to the surface where they are skimmed off. Depending on the quality of this material, it may be discarded as waste or recovered as oil.

COMPRESSORS

Compressors are used to boost lower pressure gas to sales line pressure, for vapor recovery, or to allow flow into central facilities. Compressors may be electric motor driven or driven by internal combustion or turbine engines.

Wastes generated include engine cooling water and used lubrication oils and filters.

DEHYDRATION AND SWEETENING UNITS

Field dehydration and sweetening units perform the same function as described for gas plants. Wastes include iron sponge, spent glycol, spent amine, spent caustic and filter media.

Scrubbers are used where necessary to separate fluids from gas. After scrubbing, recovered fluids may include condensate, oil and/or produced waters which should be recycled by returning to process facilities.

METHANOL INJECTION AND LINE HEATERS

As gas is produced from a reservoir, its pressure and temperature drop. If sufficient water or water vapor exists in the gas stream hydrates (ice) may form and block flow lines. To prevent hydrate formation, methanol is sometimes injected in low concentrations (ppm) or line heaters are used.

The only waste generated from methanol injection is empty methanol containers. Wastes generated from line heaters include spent thermal fluids (such as glycol, oil or salt mixtures) used to transfer heat from heat sources to the gas stream.

EPA's List of Exempt Exploration and Production Wastes

The following wastes are listed as exempt in EPA's Regulatory Determination submitted to Congress in June 1988:

- Produced water
- Drilling Fluids
- Drill Cuttings

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

- Light organics volatilized from exempt wastes in reserve pits or impoundments or production equipment.

EPA's List of Nonexempt Exploration and Production Wastes

EPA's Regulatory Determination for exploration and production wastes lists the following wastes as nonexempt. It appears that the EPA concluded waste materials from maintenance of production equipment as well as transportation (pipeline and trucking) related wastes were nonexempt. While the following wastes are nonexempt, they are not necessarily hazardous.

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

- Pesticide wastes
- Radioactive tracer wastes
- Drums, insulation, and miscellaneous solids.

EPA did not specifically address in the Regulatory Determination the status of hydrocarbon-bearing material that is recycled or reclaimed by reinjection into a crude stream (used oils, hydraulic fluids, and solvents).

However, under existing EPA regulations, recycled oil, even if it were otherwise hazardous, could be reintroduced into the crude stream, if it is from normal operations and is to be refined along with normal process streams at a petroleum refinery facility [see 40 CFR§261.6 (a)(3)(vi)].

ADDITIONAL EXEMPT WASTES

It should be noted that EPA's lists of exempt and nonexempt wastes are not all-inclusive and that determinations will need to be made on a number of other incidental wastes. In deciding which wastes were exempt, it appears that EPA focused on wastes necessary to conduct so-called "primary field operations" (including centralized facilities and gas plants).

Using this approach, the following wastes, although not specifically listed as exempt, appear clearly exempt.

- Excess cement slumes and cement cuttings
- Sulfur contaminated soil or sulfur waste from sulfur recovery units
- Gas plant sweetening unit catalyst
- Produced water contaminated soil
- Wastes from the reclamation of tank bottoms and emulsions when generated at a production location
- Production facility sweetening and dehydration wastes
- Pigging wastes from producer operated gathering lines
- Production line hydrotest presenring fluids utilizing produced water
- Iron sulfide

This section does not address wastes exempt from Subtitle C under other provisions of RCRA (e.g., 40 CFR 261.4).

Requirements for Nonexempt Wastes

Operators should consider testing nonexempt wastes whenever there is reason to believe they may exhibit one of the hazardous waste characteristics.

Although there is no requirement that a nonexempt waste be tested to determine if it is hazardous, civil and criminal penalties may be imposed if the waste is not managed in a safe manner, and according to regulations.

It is also important to emphasize the prudence of segregating non-exempt waste from exempt waste. One possible implication is that knowingly commingling of a nonexempt waste with an exempt waste could result in the entire waste stream losing its exempt status and perhaps having to be handled as a hazardous waste.

If the nonexempt waste were a listed hazardous waste, EPA's mixture rule makes the entire commingled waste stream subject to stringent RCRA Subtitle C requirements, including the requirement that it be disposed at a hazardous waste facility. Therefore, it is usually in the best interest of an operator to routinely segregate nonexempt waste from exempt waste. When segregation is not practical, the nonexempt waste should be examined closely to ensure that it is not a hazardous waste.

Finally, there are a few states with hazardous waste regulations which differ from those the EPA has promulgated. These state rules are at least as stringent as the federal regulations (by law they must be at least equivalent to those set forth by the EPA).

LIST OF WASTE STREAMS - New Mexico

ACID (SPENT)

WASTE CATEGORY:

Spent acid from gas processing plants may be a characterisitcally hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.20 - 261-24). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

Test for hazardous characteristics (corrosivity) and TCLP metals.

DISPOSAL AT AN OCD-APPROVED FACILITY If **NOT HAZARDOUS**: OCD does not require testing of this waste; however each OCD-approved facility may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Store acid in a properly labeled rigid-wall container prior to disposal. Handle in a manner that minimizes employee exposure.

FOR SHIPPING: if **nonhazardous** no shipping requirements. If **hazardous**, will need to review the shipping requirements and possibly test. Call ES&H in Houston for specific instructions.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT AN OCD-APPROVED FACILITY: There are no reporting requirements for the OCD. Retain a copy of the Bill of Lading or other billing information that documents the generator, type and quantity of waste, transporter, and disposal site. MAINTAIN copies of records in active files for 3 years and archived for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

If test indicates non-hazardous waste, it should be disposed of in a permitted injection/disposal well. If test indicates hazardous waste, it should be disposed of at a RCRA permitted TSD facility. Contact safety department.

ACTIVATED ALUMINA

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

DISPOSAL AT AN OCD-APPROVED FACILITY: OCD does not require testing of this waste; however each OCD-approved facility may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Drain and collect fluids. Allow alumina to dry for 48 hours. Collect and incorporate fluids into wastewater disposal system. Store alumina in a properly labeled container prior to disposal.

FOR OFFSITE SHIPPING, not a hazardous waste, therefore no shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT AN OCD-APPROVED FACILITY: There are no reporting requirements for the OCD. Retain a copy of the Bill of Lading or other billing information that documents the generator, type and quantity of waste, transporter, and disposal site. MAINTAIN copies of records in active files for 3 years and archived for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-approved disposal facility. See Section 12 for a complete and current list of facilities.

AMINE - includes spent monoethanolamine, diethanolamine.

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988) **when used in gas sweetening processes**. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

FOR DISPOSAL VIA CLASS II DISPOSAL WELL: no testing is required.

FOR DISCHARGE PER NPDES PERMIT: comply with testing requirements specified in the permits.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Collect in storage vessel such as sump or storage tank prior to disposal in onsite or commercial disposal well.

FOR SHIPPING OFFSITE: For **Monoethanolamine only** the shipping description is **Ethanolamine Solutions, 8, UN2491, III**. Shipping papers are **required**, the placard is **Corrosive**. For **Diethanolamine only** the shipping description is **RQ, Environmentally Hazardous Substance, liquid, N.O.S. (contains Diethanolamine), 9, UN3082, III**. Shipping papers are **required**, the placard is **Class 9**.

RECORDKEEPING/REPORTING REQUIREMENTS:

FOR ONSITE DISPOSAL: maintain records per Class II permit or NPDES permit.

FOR DISPOSAL AT COMMERCIAL FACILITIES: keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, and disposal facility.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Class II disposal well (onsite or offsite) permitted by the OCD to **dispose of gas plant wastewaters**; **OR**, if specified in the permit, NPDES discharge.

AMINE RECLAIMER BOTTOMS

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

FOR RECLAIMING, DISPOSAL PER CLASS II DISPOSAL WELL, OR OCD-PERMITTED DISPOSAL FACILITIES: the OCD does not require testing. However, each OCD-permitted disposal pit may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Removal of bottoms from vessels should be done in such a manner as to minimize spillage. Use drip pans or catchment vessels.

Mix solids with wastewaters for disposal via Class II disposal well.

For storage onsite prior to disposal, place in drums, tanks, or other closed/covered containers, or remove from site immediately upon removal of bottoms from vessels.

FOR SHIPPING OFFSITE: For **Monoethanolamine only** the shipping description is **Ethanolamine Solutions, 8, UN2491, III**. Shipping papers are **required**, the placard is **Corrosive**. For **Diethanolamine only** the shipping description is **RQ, Environmentally Hazardous Substance, liquid, N.O.S. (contains Diethanolamine), 9, UN3082, III**. Shipping papers are **required**, the placard is **Class 9**.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT A OCD FACILITY (including commercial disposal wells or waste pits): There are no reporting requirements. Keep Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, the generator, transporter, and disposal site.

FOR ONSITE DISPOSAL WELLS: maintain records per Class II disposal well permit.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Class II disposal well (on-site or off-site) permitted by the OCD to accept gas plant wastewaters.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

ANTIFREEZE (USED)

WASTE CATEGORY:

Used antifreeze consists of a mixture of ethylene glycol and water that is used as a heat transfer medium in internal combustion gas compressor engines. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Used antifreeze should be recycled or reclaimed if possible.

TESTING:

FOR RECLAIMING, DISPOSAL PER CLASS II DISPOSAL WELL, OR OCD-PERMITTED DISPOSAL FACILITIES: the OCD does not require testing. However, each OCD-permitted disposal pit may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Remove antifreeze from radiator/engine in a manner which prevents spillage. Drip pans or catchment vessels are recommended. If antifreeze is stored, leak-proof, rigid-walled containers are preferred.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT A OCD FACILITY: There are no reporting requirements. Keep Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, the generator, transporter, and disposal site.

FOR ONSITE DISPOSAL WELLS: maintain records per Class II disposal well permit.

FOR RECLAIM OR RECYCLE: No recordkeeping requirements.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

If reclaim or recycle not possible, state may allow disposal in a permitted injection well. Contact environmental staff.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

BARRELS/DRUMS/CONTAINERS (NOT EMPTY)

WASTE CATEGORY:

Containers which held chemicals, paints, thinners, solvents, or other products but now are only partially full of the material. The exact contents of the material in the barrel/drum may be unknown. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

If the contents are known, return the barrel/drum/container to the vendor or use the contents. If the contents are unknown, see **MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS** section below.

TESTING:

Contact environmental staff.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

If the contents of the barrel/drum/container are known, handle the material as indicated by the MSDS. If the contents are unknown, contact your environmental staff. Store the barrel/drum/container so that leakage is prevented. Place bungs or covers securely on containers during storage.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT A OCD FACILITY: There are no reporting requirements. Keep Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, the generator, transporter, and disposal site.

FOR RECLAIM OR RECYCLE: No recordkeeping requirements.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

If reclaim or recycle not possible, Contact environmental staff.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

BOILER WATER BLOWDOWN

WASTE CATEGORY:

Non-exempt solid waste (53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

FOR DISPOSAL WELL: this waste must be tested for *ignitability, corrosivity, reactivity,* and Toxicity Characteristic Leaching Procedure (TCLP) metals and organic compounds to characterize the waste. If the generator can prove by knowledge of process, that this waste is not hazardous, then no testing is required. The generator must provide information concerning the process and the chemicals used in that process.

FOR NPDES DISCHARGE: comply with testing specified in the permits.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Collect in storage vessel such as sump or storage tank prior to disposal.

FOR SHIPPING: if **nonhazardous** no shipping requirements. If **hazardous**, will need to review the shipping requirements and possibly test. Call EH&S in Houston for specific instructions.

RECORDKEEPING/REPORTING REQUIREMENTS:

FOR ONSITE DISPOSAL, *maintain records per Class II or NPDES permit.*

FOR DISPOSAL AT COMMERCIAL FACILITIES: keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, and disposal facility.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

IF NONHAZARDOUS: Class II disposal well (onsite or offsite) permitted by the OCD **to dispose of gas plant wastewaters**; **OR**, if specified in the permit, discharge per NPDES permit .

IF THE WASTE IS HAZARDOUS: it can be disposed in a Class I Hazardous disposal well or if specified in the permit, NPDES discharge.

BRINE CONTAMINATED SOILS

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988) The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

DISPOSAL AT AN OCD-APPROVED FACILITY: OCD does not require testing of this waste; however each OCD-approved facility may have specific testing requirements.

FOR ON-SITE TREATMENT/DISPOSAL: Contact environmental department.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

If necessary, brine contaminated soils should be stored in an area lined with impermeable material and bermed to prevent runoff or leaching.

When remediation is deemed necessary (usually per landowner's request) contaminated soils should be sampled and analyzed for chloride content and sodium absorption ratio. Soil restoration should begin promptly. In-place treatment is recommended. Depending on site hydrologic characteristics, land treatment may be acceptable. Gypsum or other soil treatments may be applied. (Such as LCA 11.) Soil rinsing may be appropriate with approved disposal of residue (see Brine Water).

FOR SHIPPING OFFSITE, no shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

FOR ONSITE TREATMENT/DISPOSAL: Contact environmental department.

FOR DISPOSAL AT COMMERCIAL FACILITIES: keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, and disposal sites.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Removal of the contaminated soil and disposal in a permitted off-site pit or landfill is acceptable. Contact safetydepartment.

BRINE WATER

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

FOR DISPOSAL VIA CLASS II DISPOSAL WELL: no testing is required.

FOR DISCHARGE PER NPDES PERMIT: comply with the testing requirements specified in the permits.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Separate oil, condensate, water. Store water in holding vessels such as sumps, storage tanks or evaporation pits prior to disposal. Tanks and pits that might contain oil should be flagged, netted or covered in some manner to protect wildlife. Avoid contact with soil as much as possible. Collect hydrocarbons in storage vessel for sale.

FOR SHIPPING OFFSITE, no shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

FOR ONSITE DISPOSAL: maintain records per Class II or NPDES permit.

FOR DISPOSAL AT COMMERCIAL FACILITIES: keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, and disposal sites.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Class II disposal well (onsite or offsite) permitted by the OCD **to dispose of gas plant wastewaters**; **OR**, if specified in the permit, NPDES discharge.

Off-site evaporation at a permitted facility.

CAUSTIC - spent.

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

FOR DISPOSAL VIA CLASS II DISPOSAL WELL: no testing is required.

FOR DISCHARGE PER NPDES PERMIT: comply with testing requirements specified in the permits.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Collect in storage vessel such as sump, storage tank, or evaporation pit prior to disposal. Tanks and pits that might contain oil should be flagged, netted or otherwise covered to protect wildlife.

FOR SHIPPING: The shipping description is **Sodium Hydroxide, Solution, 8, UN1824, II**. Shipping papers are **required**, the placard is **Corrosive**. If the shipment contains 1,000 lbs or more, the letters "**RQ**" must precede the shipping description.

RECORDKEEPING/REPORTING REQUIREMENTS:

FOR ONSITE DISPOSAL: maintain records per Class II permit or NPDES permit.

FOR DISPOSAL AT COMMERCIAL FACILITIES: keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, and disposal facility.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Class II disposal well (onsite or offsite) permitted by the OCD **to dispose of gas plant wastewaters**; **OR**, if specified in the permit, NPDES discharge.

CHARCOAL

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988) The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

DISPOSAL AT A OCD-PERMITTED FACILITY: OCD does not require testing of this waste; however each OCD-approved facility may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Drain and collect fluids. Allow charcoal to dry for 48 hours. Collect and incorporate fluids into wastewater disposal system. Store charcoal in a properly labeled and sealed container prior to disposal. Dust can be explosive.

FOR SHIPPING OFFSITE: The shipping description is **Charcoal, 4.2, NA1361, III**. Shipping papers are **required**. The placard is **Spontaneously Combustible**.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT OCD FACILITY: There are no reporting requirements for the OCD. Retain a copy of the Bill of Lading or other billing information that documents the generator, type and quantity of waste, transporter, and disposal site.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

COOLING TOWER BLOWDOWN

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Use corrosion inhibitors that do not contain chromium.

Operate cooling towers efficiently to minimize the generation of blowdown.

TESTING:

FOR DISPOSAL WELL VIA CLASS II DISPOSAL WELL: no testing is required.

FOR DISCHARGE PER NPDES: comply with testing requirements specified in the permits.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Collect in wastewater storage vessel such as sump, storage tank or evaporation pit prior to disposal. Tanks and pits that might contain oil should be flagged, netted or otherwise covered to protect wildlife.

FOR SHIPPING OFFSITE, no shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

FOR ONSITE DISPOSAL: maintain records per Class II or NPDES permit.

FOR DISPOSAL AT COMMERCIAL FACILITIES: keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, and disposal facility.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Class II disposal well (onsite or offsite) permitted **to dispose of gas plant wastewaters**; **OR**, if specified in the permit, NPDES discharge.

COOLING TOWER SLUDGE

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Use corrosion inhibitors that do not contain chromium.

TESTING:

DISPOSAL AT A OCD-APPROVED FACILITY: The waste must be characterized. Test for Toxicity Characteristic Leaching Procedure (TCLP) metals and organics, ignitability, and reactivity. Use the Paint Filter Liquids test to determine if sludge contains free liquid. If free liquids are present test for corrosivity. If the generator can prove by knowledge of process that a waste is not hazardous, then no testing is required. The generator must provide information regarding the process from which the waste is generated and the chemicals used in that process.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

(1) Remove all free liquids and incorporate into wastewater disposal system. (2) Store in drums, tanks, or other closeable containers.

FOR SHIPPING OFFSITE: *if* **nonhazardous** *there are no shipping requirements.* If **hazardous**, will need to review the shipping requirements and possibly test. Call EH&S in Houston for specific instructions.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT OCD FACILITY: There are no reporting requirements for the OCD. Retain a copy of the Bill of Lading or other billing information that documents the generator, type and quantity of waste, transporter, and disposal site.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

DEBRIS, UNCONTAMINATED - includes wood, glass, concrete.

WASTE CATEGORY:

Inert nonhazardous solid waste. Inert wastes can be disposed at facilities approved by the New Mexico Oil Conservation Division or at a municipal landfill. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

None required.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Store in labeled bins. Do not mix with material that is contaminated or may be hazardous.

FOR SHIPPING OFFSITE, no shipping requirements if uncontaminated.

RECORDKEEPING/REPORTING REQUIREMENTS:

Permits are not necessary for the disposal of inert and uncontaminated solid waste. Keep Bill of Lading, run ticket, or other billing information that documents the generator, transporter, disposal site, and volume of debris disposed.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

On-site burial if permitted in the facility discharge plan. Consult lease requirements and landowner for any additional requirements.

DEHYDRATOR - CONDENSED WATER

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988) The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

None required.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Should be stored in leak-proof, rigid-walled containers.

FOR SHIPPING OFFSITE, no shipping requirements if uncontaminated.

RECORDKEEPING/REPORTING REQUIREMENTS:

Permits are not necessary for the disposal of inert and uncontaminated solid waste. Keep Bill of Lading, run ticket, or other billing information that documents the generator, transporter, disposal site, and volume of debris disposed. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Class II disposal well (onsite or offsite) permitted **to dispose of gas plant wastewaters**; OR, if specified in the permit, NPDES discharge

DRUMS - Empty plastic or metal.

WASTE CATEGORY:

Non-exempt solid waste. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste. Check the Material Safety Data Sheet (MSDS) and Hazardous Waste Booklet (Section 14) to confirm whether drum contained a pure product that is listed as acutely hazardous. If the product is acutely hazardous consult with HE&LP in Houston for specific cleaning instructions.

WASTE MINIMIZATION:

Return drums to vendor.

Use tanks to store chemicals in bulk and reduce or eliminate the use of drummed chemicals.

TESTING:

None required.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Do not allow empty drums to accumulate onsite. All drums must be empty; i.e., All materials or wastes have been removed using practices employed to handle drums such as pouring, pumping, or aspirating. No more than 2.5 centimeters (one inch) of residue remains on the bottom of the drum or inner liner. No more than 3% by weight of the total capacity of the container remains in the container or inner liner if the container is less than or equal to 110 gallons in size; no more than 0.3% by weight of the total capacity of the container or inner liner if the container is greater than 110 gallons in size. Mark the drums as "Empty" and use one of the following options prior to disposal. 1) Replace the lid or bungs tightly on empty drums to prevent the accumulation of rainwater or other materials. Rainwater or other materials that accumulate in empty drums may have to be handled and disposed as hazardous waste. 2) Cut the ends out of the drum so it cannot be used as a container.

FOR SHIPPING: Remove or paint over all DOT markings and labels on drums prior to shipping.

RECORDKEEPING/REPORTING REQUIREMENTS:

Track the empty drums using the Warren Petroleum Company Waste Drum/Container Log (Section 11). Keep Bill of Lading, run ticket, or other information that documents the generator, transporter, disposal site and volume when drums are disposed. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Recycle drums: Make arrangements with vendor to return on a deposit basis.

Replace drums with bulk storage units.

FILTERS, AIR

WASTE CATEGORY:

Inert nonhazardous solid waste. This waste can be disposed at a facility permitted by the New Mexico Oil Conservation Division or at a municipal landfill.

WASTE MINIMIZATION:

None at this time.

TESTING:

None required.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Store separately from oil, sock, glycol or other filters to avoid contamination, testing and permitting requirements.

FOR SHIPPING OFFSITE, no shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

Permits are not necessary if disposed with other inert solid waste. Keep Bill of Lading, run ticket, or other billing information that documents the generator, transporter, disposal site, and volume of filters disposed. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

FILTERS, GLYCOL

WASTE CATEGORY:

Inert nonhazardous solid waste. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste

WASTE MINIMIZATION:

None at this time.

TESTING:

TCLP (not required if recycled).

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Waste filters should be handled in a way to prevent spillage. Drip pans or catchment vessels should be used. All liquids should be drained from filters before disposal. Liquids should be returned to production facilities for reprocessing. Filters should be segregated from other filter types, placed in plastic garbage bags and into metal containers.

FOR SHIPPING OFFSITE, no shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

Keep following records: Disposal date, number of filters disposed of, haulers name, location and name of disposal facility. Results of analyses (TCLP) required for disposal into landfill. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Recycle filters.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

FILTERS, SOCK includes sock filters used as glycol, and amine filters.

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

DISPOSAL AT A OCD-APPROVED FACILITY: OCD does not require testing of this waste; however, each OCD-approved facility may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Drain and collect liquids. Allow filters to dry for 48 hours. Store in bin for process filters. Incorporate liquids into wastewater disposal system.

FOR SHIPPING OFFSITE, not a hazardous waste, therefore no shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT A OCD FACILITY: There are no reporting requirements for the OCD. Keep copies of Bill of Lading, run ticket or other billing information that documents the type and volume of waste, generator, transporter, and disposal facility.

Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

FILTERS, USED OIL - non-terne plated; terne is an alloy of tin and lead which is used to plate oil filters. These filters are from an internal combustion engine used to filter crankcase oil.

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA) (261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

DISPOSAL AT A OCD-PERMITTED FACILITY: each OCD-permitted facility may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Drain more than 24 hours to remove all used oil by one of the following hot-draining methods: 1) Puncturing the filter anti-drain back valve or the filter dome end and hot-drain; OR 2) Hot-drain and crush; OR 3) Dismantle and hot-drain; OR 4) Flush the filter; OR 5) Any other equivalent method which will remove the free flowing oil.

After draining, allow filters to dry. Collect oil and reclaim or sell for refining. Store filters in covered enclosure or covered rainproof containers on an impermeable surface. Containers must be labeled "Used Oil Filters". **Do not keep storage units containing filters onsite more than 30 days**. Transport containers must be labeled with the date, the final destination, and the name and address of both the generator and the transporter.

FOR SHIPPING OFFSITE, if **nonhazardous** no shipping requirements. If **hazardous** contact EH&S in Houston for specific shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT AN OCD FACILITY: There are no reporting requirements for the OCD. Retain copies of the Bill of Lading, run ticket, or other billing information that documents the volume and type of waste, generator, transporter, and disposal facility.

Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

OCD-permitted processor, disposer, or end user (someone who uses the oil filters or its components as feedstock for their processes).

GLYCOL - spent ethylene glycol, triethylene glycol, and diethylene glycol.

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) **when used in dehydration processes** (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

FOR DISPOSAL VIA CLASS II DISPOSAL WELL: no testing is required.

FOR DISCHARGE PER NPDES PERMIT: comply with testing requirements specified in the permits.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Collect in storage vessel such as sump or tank, prior to disposal. Tanks that might contain oil should be flagged, netted or otherwise covered to protect wildlife.

FOR SHIPPING OFFSITE, For **Ethylene Glycol only** the shipping description is **RQ, Environmentally Hazardous Substance, liquid, N.O.S. (contains ethylene glycol), 9, UN3082, III**. Shipping papers are **required**, the placard is **Class 9**.

RECORDKEEPING/REPORTING REQUIREMENTS:

FOR ONSITE DISPOSAL: maintain records per Class II permit or NPDES permit.

FOR DISPOSAL AT COMMERCIAL FACILITIES: keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, and disposal facility. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Class II disposal well (onsite or offsite) permitted **to dispose of gas plant wastewaters**; **OR**, if specified in the permit, NPDES discharge.

HYDROSTATIC TEST WATER

WASTE CATEGORY:

Hydrostatic test water is **exempt** from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b)) **when derived from the testing of gathering pipelines or pipelines used to transport raw or unrefined products**. Hydrostatic test water is **non-exempt** solid waste under RCRA **when derived from the testing of transmission pipelines or pipelines used to transport refined products**. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste. See Section 12 (Guidelines for Hydrostatic Test Dewatering) for specific information regarding the requirements for disposal of this waste in New Mexico.

WASTE MINIMIZATION:

Conduct tests only when necessary.

TESTING:

FOR CLASS II DISPOSAL WELL: if exempt no testing is required. If non-exempt, test for Toxicity Characteristic Leaching Procedure (TCLP) metals and organics, ignitability, corrosivity and reactivity. If the generator can prove by knowledge of process that this waste is not hazardous, then no testing required. The generator must provide information on the chemical composition of the waste and the process from which it was derived.

FOR DISCHARGE PER NPDES PERMIT: meet testing requirements of the permits.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Store water in holding vessels such as sumps, storage tanks or evaporation pits prior to disposal. Tanks and pits that might contain oil should be flagged, netted, or otherwise covered to protect wildlife.

FOR SHIPPING OFFSITE, if **nonhazardous**, no shipping requirements. If **hazardous**, need to review shipping requirements and possibly test. Contact EH&S in Houston for specific shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

FOR ON-SITE DISPOSAL: maintain records per Class II permit or NPDES permit.

FOR DISPOSAL AT COMMERCIAL FACILITIES: maintain records of type and volume of waste, generator, transporter, and disposal facility by retaining run tickets or other billing information. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

IF EXEMPT OR NONHAZARDOUS: Class II disposal well (onsite or offsite) permitted **for disposal of gas plant wastewaters**; **OR**, if specified in the permit, NPDES discharge.

IF THE WASTE IS HAZARDOUS: it can be disposed in a Class I Hazardous disposal well; **OR**, if specified in the permit, NPDES discharge.

INHIBITORS (USED) / BIOCIDES

WASTE CATEGORY:

(Chemical inhibitors can be used for selected chemical treating programs to prevent scale. In most cases these chemicals will remain in the gas stream and do not become a waste management issue. This description addresses the case where inhibitors are recovered). Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

FOR DISPOSAL VIA CLASS II DISPOSAL WELL: TCLP, RIC if recovered inhibitors cannot be reused.

FOR DISCHARGE PER NPDES PERMIT: comply with testing requirements specified in the permits.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

All spent inhibitors should be contained to prevent spills or leaching to the soil. Drums or containerized storage is preferred.

RECORDKEEPING/REPORTING REQUIREMENTS:

FOR DISPOSAL AT COMMERCIAL FACILITIES: keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, and disposal facility. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Reuse/reclaim if possible.

If reuse/reclaim not possible, contact the safety and environmental department for case bycase evaluation.

IRON SPONGE

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

DISPOSAL AT A OCD-PERMITTED FACILITY: each OCD-permitted facility may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Wash thoroughly with a soda ash and water solution by circulating it through the bed for several hours to prevent auto-ignition. Can also be regenerated using this method. Incorporate soda ash solution into water disposal system.

FOR SHIPPING OFFSITE, no shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT A OCD FACILITY: There are no reporting requirements for the OCD. Keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, disposal facility, and any analytical results.

Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

LEAD ACID BATTERIES

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Recycle or return to vendor if possible.

TESTING:

DISPOSAL AT A OCD-PERMITTED FACILITY: each OCD-permitted facility may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Wear protective equipment and handle in manner to prevent spillage of acid. Store in vented area. Do not store on ground or cement slab.

RECORDKEEPING/REPORTING REQUIREMENTS:

1) DOT manifest for transport by vessel. 2) Retain copy at assigned locations. 3) Copy of MSDS.

Keep records of off-site recycling in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Return to vendor for exchange.

Local recycler.

LITHIUM BATTERIES

(Batteries used in Haliburton flow meters)

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Recycle or return to vendor if possible.

TESTING:

DISPOSAL AT A OCD-PERMITTED FACILITY: each OCD-permitted facility may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Wrap in shipping container provided by Haliburton. Store in a cool dry area.

RECORDKEEPING/REPORTING REQUIREMENTS:

1) Mailing receipts. 2) Copy of MSDS.
Keep records of off-site recycling in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Return to vendor.

MERCURY

WASTE CATEGORY:

Mercury is a listed hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.20 - 261-24). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

None if reclaimed or recycled, otherwise TCLP/Mercury and Total/Mercury.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Contact Safety & Environmental Manager prior to any mercury handling. Should be stored in air-tight, properly labeled containers.

RECORDKEEPING/REPORTING REQUIREMENTS:

Manifests or records of recycling. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details. No hazardous waste disposal is allowed in OCD-permitted facilities.

Contact safety department for recycling.

Dispose at an EPA permitted hazardous waste facility. Contact safety department.

MOLECULAR SIEVE

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Regenerate for reuse.

TESTING:

DISPOSAL AT A OCD-PERMITTED FACILITY: each OCD-permitted facility may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Drain all liquids and incorporate them into the water disposal system. Allow molecular sieve to cool in a nonhydrocarbon inert atmosphere. Hydrate in ambient air for 24 hours.

FOR SHIPPING OFFSITE, no shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT A OCD FACILITY: There are no reporting requirements for the OCD. Keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, disposal facility, and any analytical results.

Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Regenerate for reuse.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

NORM (Naturally Occurring Radioactive Material)

WASTE CATEGORY:

Special E&P Waste (Contact the Safety/Environmental Department). See Section 12 of the Manual for specific procedures for NORM handling and disposal in New Mexico.

WASTE MINIMIZATION:

None at this time.

TESTING:

Will be required for ground contamination and prior to disposal company acceptance. Check state rules.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Review company safety guidelines for handling NORM. Protect ground area with non-permeable material. NORM should be properly labeled and contained in an isolated area where there is restricted access to the public and employees. Area should be clearly marked.

RECORDKEEPING/REPORTING REQUIREMENTS:

Records generated for the disposal or storage of NORM should be maintained as active files.

DISPOSAL OPTIONS:

Do not dispose of NORM without approval of Safety/Environmental Department.

OILY RAGS - contaminated with lubricating oil.

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Use a contractor to supply clean rags and pick up used rags.

TESTING:

RECYCLING: The contractor may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Store in containers marked for oily rags only. Keep cover of container secure when not transferring material. Do not mix with material that may be hazardous.

FOR SHIPPING OFFSITE, if **nonhazardous**, no shipping requirements. If **hazardous**, will need to review the shipping requirements. Contact EH&S, in Houston for specific shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

RECYCLING: Keep Bill of Lading, run ticket, or other billing information that documents the generator, transporter, disposal site, and volume of material recycled.

Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Contract with a company to recycle used rags.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

PAINTING WASTES

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

Contact the Safety & Environmental Department.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Paints should remain in their original metal containers with tight fitting lids.

RECORDKEEPING/REPORTING REQUIREMENTS:

If waste is hazardous, manifests, test data, and disposal records must be retained for three years and archived for fifteen years. No recordkeeping is necessary for non hazardous disposal.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Unused paint should be applied to equipment and buildings to prevent corrosion and water damage. Empty containers may be disposed of in permitted landfills.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

PAINTING SOLVENT - used

WASTE CATEGORY:

Special - contact ES&H Deaprtment in Houston. Used painting solvent which is returned directly to condensate stream (hydrocarbon) without processing is not defined as a solid waste by the Resource Conservation and Recovery Act (RCRA).

WASTE MINIMIZATION:

None at this time.

TESTING:

Contact the Safety & Environmental Department.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Painting solvent should not be filtered, accumulated, stored or otherwise processed prior to returning to condensate stream.

RECORDKEEPING/REPORTING REQUIREMENTS:

No recordkeeping is necessary if painting solvent returned to condensate stream.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Do not process used painting solvent prior to returning to condensate stream. Processing creates a "solid waste" which may be subject to hazardous waste regulations.

PIGGING WASTE

WASTE CATEGORY:

Exempt waste under the Resource Conservation and Recovery Act (RCRA) if derived from gathering line; non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA) if from distribution line. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

If non-exempt, TCLP; RIC analysis may be required. Contact Safety & Environmental Department

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Should be handled to prevent spills or leakage. Should be stored in rigid-walled, leak-proof containers.

RECORDKEEPING/REPORTING REQUIREMENTS:

Maintain manifest or run ticket for a minimum of three years if off-site disposal is utilized and records archived for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

If exempt, liquids can be disposed of at a Class II injection well. Solids need to go to an oil and gas permitted facility. If hazardous or non-exempt, contact the safety & environmental department.

PLANT TRASH - includes paper, cardboard, plastic containers, glass. Does not include items such as aerosol cans, paint cans, pesticides, batteries or flammables.

WASTE CATEGORY:

Inert nonhazardous solid waste. Inert wastes can be disposed at a facility permitted by the New Mexico Oil Conservation Division or a permitted landfill.

WASTE MINIMIZATION:

None at this time.

TESTING:

None required.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Store in labeled bins. Do not mix with material that is contaminated or may be hazardous.

FOR SHIPPING OFFSITE, no shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

Keep Bill of Lading, run ticket, other billing information that documents the generator, transporter, disposal site, and volume of material disposed. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Recycle paper, cardboard, glass, aluminum and plastics.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

PROCESS WASTEWATER

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988) The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

FOR DISPOSAL WELL: this waste must be tested for ignitability, corrosivity, reactivity, Toxicity Characteristic Leaching Procedure (TCLP) metals and organic compounds. If the generator can prove by knowledge of process that this waste is not hazardous then no testing is required. The generator must provide information concerning the process and the chemicals used in the process.

FOR DISCHARGE PER NPDES PERMIT: comply with testing requirements of the permits.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Store water in holding vessels such as sumps, storage tanks, or evaporation pits prior to disposal. Tanks and pits that might contain oil should be flagged, netted, or otherwise covered to protect wildlife.

FOR SHIPPING OFFSITE, if **nonhazardous**, no shipping requirements. If **hazardous**, need to review the shipping requirements and possibly test. Contact EH&S for specific shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

FOR ON-SITE DISPOSAL: maintain records per Class II permit or NPDES permit.

FOR DISPOSAL AT COMMERCIAL FACILITIES: keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, and disposal facility. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

IF NONHAZARDOUS, Class II disposal well (on-site or off-site) permitted **for disposal of gas plant wastewaters**; **OR**, If specified in the permit, NPDES discharge.

IF THIS WASTE IS HAZARDOUS: it can be disposed in a Class I Hazardous disposal well; **OR**, if specified in the permit, NPDES discharge.

PRODUCED WATER

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988) The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Regenerate for reuse.

TESTING:

None required

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Should be handled in a manner which prevents spillage onto ground or other surface and stored in rigid-walled containers.

RECORDKEEPING/REPORTING REQUIREMENTS:

State injection well regulations require that records be kept of volumes injected, annular pressures, origin of produced water. These records are required to be kept for a period of threeyears, and then should be archived for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Produced water can be injected into a state permitted Class II injection well.

SANDBLAST MEDIA

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Disposal of sandblast media used by a contractor remains the responsibility of that contractor.

TESTING:

Test for TCLP metals.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Enclose area to be blasted to collect media. Use proper personal protective equipment. Store in rigid-walled containers, or in 5000# polyurethane sacks.

RECORDKEEPING/REPORTING REQUIREMENTS:

All off-site disposal records should be maintained as active files for three years and archived for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Disposal of sandblast media used by a contractor remains the responsibility of that contractor. If non-hazardous, recycle for reuse. Company generated sandblast media should be analyzed for TCLP metal content prior to disposal. Refer laboratory results to the Safety & Environmental Department.

SEWAGE

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA). Local authorities typically have jurisdiction over sewage disposal (either in a sewer system or via septic tank). OCD has authority over sewage disposal when it is mixed with an oilfield waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

None.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Should be handled in a manner that minimizes exposure to workers. Adequate sanitary procedures should be implemented. For- long term operations, a septic system may be desirable. Septic systems must be permitted by state or local authorities.

RECORDKEEPING/REPORTING REQUIREMENTS:

Local authorities may have specific recordkeeping or reporting requirements.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Disposal in local sewer system (requires sewer connection).

Can be disposed of in an on-site septic system or by a commercially owned sanitation service.

SCRAP METAL - uncontaminated.

WASTE CATEGORY:

Nonhazardous solid waste. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

Testing is not required unless contamination or scale is present. Review the Warren Petroleum Company policy on testing for Naturally Occurring Radioactive Material (NORM).

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Store in areas designated for scrap metal. Do not mix with contaminated or hazardous material.

FOR SHIPPING: if not radioactive then no shipping requirements. If **radioactive**, call EH&S in Houston for specific instructions.

RECORDKEEPING/REPORTING REQUIREMENTS:

Keep Bill of Lading, run ticket, or other billing information that documents the generator, transporter, recycle site, and volume of scrap recycled. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

SILICA GEL

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

DISPOSAL AT A OCD-PERMITTED FACILITY: each OCD-permitted facility may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Drain all liquids and allow silica gel to dry for 48 hours. Incorporate fluids into water disposal system.

FOR SHIPPING OFFSITE, no shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT AN OCD FACILITY: There are no reporting requirements for the OCD. Keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, disposal facility, and any analytical results.

Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

SOIL CONTAMINATED WITH CRUDE OIL

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Check equipment on a regular basis for leaks, spills. Repair or replace leaking equipment immediately. Use sorbent pads to prevent spills from contaminating the soil.

TESTING:

LANDFARM ONSITE: Total Petroleum Hydrocarbons (TPH) by Method 418.1 and leachable chlorides.

DISPOSAL AT A OCD-PERMITTED FACILITY: each OCD-permitted facility may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Contaminated soils must be cleaned up. For small, localized spills remediate by tilling soil and adding fertilizer. For remediation (such as landfarming) of large quantities of soil onsite the OCD may have site specific handling requirements. Contact the OCD District Office (Sectioon 13) for specific guidelines.

FOR SHIPPING OFFSITE, contact EH&S for specific shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

LANDFARM ONSITE: For large spills, send a letter to the District Office detailing the landfarm procedures, the quantity of soil involved, and receive written approval from the District.

DISPOSAL OR LANDFARMING AT AN OCD FACILITY: Keep Bill of Lading, run ticket, or other billing information that documents the generator, transporter, disposal site, and volume of soil to be treated or disposed.

Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Landfarm onsite if permitted by disposal plan.

Landfarm or disposal at OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

SOIL CONTAMINATED WITH LUBE OIL

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Check equipment on a regular basis for leaks, spills. Repair or replace leaking equipment immediately. Use sorbent pads to prevent spills from contaminating the soil.

TESTING:

LANDFARM ONSITE: Total Petroleum Hydrocarbons (TPH) by Method 418.1 and leachable chlorides.

DISPOSAL AT A OCD-PERMITTED FACILITY: each OCD-permitted facility may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Contaminated soils must be cleaned up. For small, localized spills remediate by tilling soil and adding fertilizer. For remediation (such as landfarming) of large quantities of soil onsite the OCD may have site specific handling requirements. Contact the OCD District Office (Section 13) for specific guidelines.

FOR SHIPPING OFFSITE, contact Compliance for specific requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

LANDFARM ONSITE: For large spills, send a letter to the District Office detailing the landfarm procedures, the quantity of soil involved, and receive written approval from the District.

DISPOSAL OR LANDFARMING AT A OCD FACILITY: Keep Bill of Lading, run ticket, or other billing information that documents the generator, transporter, disposal site, and volume of soil to be treated or disposed.

Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Landfarm onsite if permitted by the disposal plan

Landfarm or disposal at OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

SOLVENT, HAZARDOUS - this material is either a listed hazardous waste according to 40 CFR 261.31 or is characteristically hazardous according to 40 CFR 261.21-24. The characteristics of the solvent are on the Material Safety Data Sheet (MSDS).

WASTE CATEGORY:

Non-exempt hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Use water-based solvents or detergents when possible.

TESTING:

If the waste is a listed hazardous waste per 40 CFR 261.31, then no testing is necessary. If the waste could be characteristically hazardous waste test for Ignitability, Toxicity Characteristic Leaching Procedure (TCLP) metals and organics, Reactivity and Corrosivity. The MSDS may have specific information regarding the solvents hazardous status. If the generator can prove by knowledge of process that the solvent is not hazardous then no testing is required. The generator must provide information about the chemical composition of the solvent and about the processes in which it was used.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Do not mix waste solvents with materials that are not hazardous. Nonhazardous waste mixed with a listed hazardous waste is automatically hazardous and increases the volume of hazardous waste that must be treated and disposed.

Store in containers for "Used Solvent" Only. Keep cover secure when not transferring material. Containers should be stored on an impervious surface and/or in a covered area. For conditionally exempt small quantity generators (CESQG) (generators producing less than 220 lbs per calendar month) do not accumulate more than 2200 lbs (1,000 kilograms) onsite at any one time. If the generator accumulates more than 2200 lbs onsite at any one time, then the generator must meet the requirements of a small quantity generator or large quantity generator depending on the volume of waste onsite.

FOR SHIPPING: the hazardous nature of this solvent will determine which shipping requirements to follow. Contact EH&S in Houston for specific instructions.

RECORDKEEPING/REPORTING REQUIREMENTS:

FOR CESQGs: keep Bill of Lading, run ticket, or other billing information that documents the generator, transporter, disposal site, and volume of material recycled or disposed. The generator may have to obtain an EPA identification number; many disposal facilities will not accept waste, regardless of generator status, without an EPA identification number. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Contract with a company to recycle waste solvents.

Dispose at a disposal facility permitted to accept waste solvent.

SOLVENT, NONHAZARDOUS - this material does not contain listed hazardous wastes (40 CFR 261.31) and is not characteristically hazardous (40 CFR 261.21-24). The characteristics of the solvent are on the Material Safety Data Sheet (MSDS).

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

If the generator can prove by knowledge of process, including information on the MSDS, that the waste is not characteristically hazardous and has not been combined with a listed hazardous waste, no testing is required. If the waste could be characteristically hazardous, then test for ignitability, Toxicity Characteristic Leaching Procedure (TCLP) metals and organics, corrosivity, and reactivity.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Store spent solvent in a sealable container or combine with slop oil or condensate. Do not mix with material that may be hazardous. Containers should be stored on an impervious surface and/or in a covered area.

FOR SHIPPING: the specific nature of the solvent will determine the applicable shipping requirements. Contact EH&S in Houston for specific instructions.

RECORDKEEPING/REPORTING REQUIREMENTS:

IF COMBINED WITH SLOP OIL, CONDENSATE OR SENT TO A RECYCLER: keep Bill of Lading, run ticket, or other billing information that documents the generator, transporter, disposal site, and volume of material recycled. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Recycle by combining with slop oil or condensate for sale.

Contract with a company to recycle waste solvents.

SORBENT PADS - CONTAMINATED WITH CRUDE OIL.

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

DISPOSAL AT A OCD-PERMITTED FACILITY: each OCD-permitted facility may have specific testing requirements.

RECYCLE: each recycler may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Remove all free oil by washing to reduce the TPH concentration and return to oil storage tanks. Store pads in containers marked for sorbent pads only. Keep cover of container secure when not transferring material. Do not mix with material that may be hazardous.

FOR SHIPPING OFFSITE, no shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT AN OCD FACILITY OR RECYCLER: There are no reporting requirements for the OCD. Keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, disposal facility, and any analytical results.

Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.
Recycle.

STORMWATER

WASTE CATEGORY:

Special E&P Waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

Test for chlorides. Check for oil sheen.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Uncontaminated stormwater should be allowed to run-off the location as needed. Stormwater collected behind firewalls should not be discharged if it contains a "sheen". Stormwater should not be stored when it prohibits adequate storage volume within diked areas for spill prevention.

RECORDKEEPING/REPORTING REQUIREMENTS:

Diked areas refer to SPCC. If stormwater is taken to an injection well for disposal, a run ticket should be retained for a period of three years.

DISPOSAL OPTIONS:

Uncontaminated stormwater should be allowed to escape from location into natural drainage pathways.

Stormwaters containing a "sheen" should have the sheen removed and then be allowed to escape into natural drainage pathways.

SUMP SLUDGE - from all sumps onsite.

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA) and must be characterized to determine if hazardous. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

FOR RECLAIMING, DISPOSAL PER CLASS II DISPOSAL WELL, OR OCD-PERMITTED DISPOSAL PITS: waste must be classified to determine if the waste is hazardous. Test for Toxicity Characteristic Leaching *Procedure (TCLP) metals and organics, reactivity and ignitability.* Use the Paint Filter Liquids test to determine if sludge contains free liquid. If free liquids are present test for corrosivity. If the generator can prove that the waste is not hazardous, then no testing is required. The generator must provide information on the chemical composition of the waste and the process from which it was produced.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Removal of sludge from sumps should be done in such a manner ad to minimized spillage. Use drip pans or catchment basins. Remove all free liquids. If nonhazardous, mix solids with wastewaters for disposal via Class II disposal well. For storage onsite prior to disposal place in drums, tanks, or other closed/covered containers or dispose immediately upon removal of bottoms from tanks.

FOR SHIPPING: if **nonhazardous**, no shipping requirements. If **hazardous** contact EH&S in Houston for specific shipping instructions.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT AN OCD FACILITY (including commercial disposal wells or waste pits): There are no reporting requirements. Keep Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, the generator, transporter, disposal site, and analytical results.

FOR ONSITE DISPOSAL WELLS: maintain records per Class II disposal well permit.

Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Class II disposal well (onsite or offsite) permitted **to accept gas plant wastewaters**.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

TANK BOTTOMS - from crude oil tanks.

WASTE CATEGORY:

Exempt from regulation as a hazardous waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

RECLAIMING: None required.

FOR RECLAIMING, DISPOSAL PER CLASS II DISPOSAL WELL, OR TRC-PERMITTED DISPOSAL PITS: the OCD does not require testing. However, each OCD-permitted disposal pit may have specific testing requirements.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Removal of bottoms from tanks should be done in such a manner ad to minimized spillage. Use drip pans or catchment basins. Remove and reclaim all free oil. Mix solids with wastewaters for disposal via Class II disposal well. For storage onsite prior to disposal place in drums, tanks, or other closed/covered containers or dispose immediately upon removal of bottoms from tanks.

FOR SHIPPING OFFSITE, contact EH&S for specific shipping instructions.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT A OCD FACILITY (including commercial disposal wells or waste pits): There are no reporting requirements. Keep Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, the generator, transporter, and disposal site. FOR ONSITE DISPOSAL WELLS, maintain records per Class II disposal well permit.

Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

Class II disposal well (onsite or offsite) permitted **to accept gas plant wastewaters.**
OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

USED OIL - includes any oil refined from crude oil, or any synthetic oil, that has been used and as a result of such use if contaminated by physical or chemical impurities (40 CFR 279.1; 57 FR 41613).

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA) (40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Inspect tanks or containers on a regular basis for leaks or spills and to confirm that storage units are in good condition.

TESTING:

RECYCLING: each recycler may have specific testing requirements (such as total halogen) prior to accepting used oil. No testing required when combined with scrubber oil or condensate for sale.

DISPOSAL: used oil must be recycled in the State of Texas.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Store in tanks or containers marked "Used Oil". Tanks and containers must be in good condition (Generators storing used oil onsite must comply with applicable requirements of 40 CFR 112 Spill Control and Countermeasures plan for used oil storage units). Keep cover secure when not transferring material. Leaks or spills must be contained and repaired immediately; releases to the environment must be cleaned up.

Shipments of used oil of 55 gallons or less may be transported by the generator in their own vehicles and without obtaining an EPA identification number. An EPA registered transporter must be used for shipments of more than 55 gallons of used oil. Generators transporting more than 55 gallons must obtain an EPA identification number and comply with all requirements of 40 CFR 279 Subpart E.

Do not mix used oil with material that may be hazardous.

FOR SHIPPING OFFSITE, *if* ***nonhazardous***, no *shipping requirements. If* ***hazardous***, need to review shipping requirements and possibly test. Contact EH&S in Houston for specific shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

DISPOSAL AT A PERMITTED RECYCLER: keep copies of Bill of Lading, run ticket, or other billing information that documents the generator, transporter, disposal site, and volume of oil shipped as well as any analytical results and certification forms required by recycler.

WHEN COMBINED WITH SCRUBBER OIL OR CONDENSATE: keep Bill of Lading, run ticket, or other billing information that documents the generator, transporter, disposal site, and volume of oil sold.

Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

Combine with scrubber oil or condensate for sale.

WASH WATER

WASTE CATEGORY:

Non-exempt solid waste under the Resource Conservation and Recovery Act (RCRA)(40 CFR 261.4(b); 53 FR 25453-25454, July 6, 1988). The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

None at this time.

TESTING:

For DISPOSAL WELL: this waste must be tested for corrosivity, reactivity, ignitability and Toxicity Characteristic Leaching Procedure (TCLP) metals and organic to characterize the waste. If the generator can prove by knowledge of process that this waste is not hazardous, then no testing required. The generator must provide information on the chemical composition of the waste and the process from which it was derived.

For NPDES DISCHARGE: comply with testing specified in the permits.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

Collect in storage vessel such as sump, storage tank or evaporation pit prior to disposal.

FOR SHIPPING OFFSITE, if **nonhazardous**, no shipping requirements. If **hazardous**, need to review shipping requirements and possibly test. Contact EH&S in Houston for specific shipping requirements.

RECORDKEEPING/REPORTING REQUIREMENTS:

FOR ONSITE DISPOSAL: maintain records per Class II or NPDES permit.

FOR DISPOSAL AT COMMERCIAL FACILITIES: keep copies of Bill of Lading, run ticket, or other billing information that documents the type and volume of waste, generator, transporter, and disposal facility. Keep records of off-site disposal in active files for three years and archive for fifteen years.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

IF NONHAZARDOUS: Class II disposal well (onsite or offsite) permitted to dispose of gas plant wastewaters; OR, If specified in the permit, discharge per NPDES permit.

IF THE WASTE IS HAZARDOUS, it can be disposed in a Class I Hazardous disposal well; OR, if specified in the permit, NPDES discharge

WOODEN PALLETS

WASTE CATEGORY:

Inert nonhazardous solid waste. The New Mexico Oil Conservation Division has jurisdiction over the management of this waste.

WASTE MINIMIZATION:

Return to vendor or sell.

TESTING:

None required.

MANAGEMENT, STORAGE AND TRANSPORTATION INSTRUCTIONS:

No special handling requirements..

RECORDKEEPING/REPORTING REQUIREMENTS:

No recordkeeping required.

DISPOSAL OPTIONS:

All waste disposal in New Mexico is regulated by OCD through facility-specific "discharge plans" that are designed to provide "protection to ground water, surface water and the environment through proper regulation of the transfer and storage of fluids at the facility, and disposal of waste liquids and solids." See Section 12 for details.

OCD-permitted disposal facility. See Section 12 for a complete and current list of facilities.

On-site burial if allowed by the discharge plan. Consult lease requirements and landowner for any additional requirements.

Vada Compressor Station
Waste Streams
Dynegy Midstream Services, L. P.

ITEM	TYPE	EXPECTED AMOUNT	SOURCE	DISPOSAL METHOD
Filter	Amine, Dust	600 Cartridges/yr	Amine, Oil, Gas filter	Waste Management
	Oil, Product		cases, Air intake	of SE New Mexico
	Charcoal, Air,		cases	
Plant	Paper, Wood,	5 tons/yr.	Office, Shop etc	Waste Management
Trash	Cardboard,			of SE New Mexico
	Household items,			
	etc.			
Oil/Scrubber	Oil sludge, Sand,	Infrequent, varied	Scrubbers, Oil	Test - Then
Tank Bottoms	Dirt, Scrubber	amounts	Tanks	Determine.
				Lea Land, Inc.
				if non-haz.
Solvent	Varsol	100 gals/yr	Parts washing	Oil Recovery
	Cleaning Fluid			Tank
Steel Drums	Lube oil, Antifreeze,	Infrequent, varied	Outside vendors	Emptied and
	Chemicals, LPG	amounts		returned to
	Odorizer			vendor.
Concrete		Infrequent, varied	Various in-plant	Waste Management
		amounts		of SE New Mexico
Molecular Sieve	Solid Particles	Infrequent varied	Dehydrators, Sulfur	Waste Management
Activated Alumina,		amounts	Plant, Water Treaters	of SE New Mexico
Sulfur Plant, Silica				or
Gel, Catalyst, Ion				Lea Land, Inc.
Exchange, Iron				
Sponge, etc.				
Amine	DEA	Infrequent negligible	Amine System	Facility Disposal
		amounts		Well
Used Oil	Lub Oils	1500 bbls/yr.	Engines	Added to Scrubber
				Oil Sales
Scrap		Infrequent varied	Maintenance,	Sold to Scrap
Metals		amounts	Construction	Dealer (Recycled)

SECTION I

General Procedures For Sample Collection and Analysis

Contact and use an EPA certified laboratory for all sampling. State and Federal regulations set strict sampling requirements for various substances. Using a properly certified lab will save time and money in the long run. A good lab will usually furnish all the sample equipment, labels and forms necessary to do a good sampling job.

Samples should be collected by personnel wearing clean, unused latex gloves. During sample collection, particular care should be taken to prevent contamination of the sample and container. A sample collected for laboratory analysis should be placed directly into the appropriate container(s) that are properly labeled.

Samples should be placed into individual airtight plastic bags, and stored in an ice chest approximately 1/4 filled with bagged ice. The containers, labels, and empty ice chests should will be provided by the laboratory.

Exhibit I shows an example of a completed sample label that includes project name, number, and location, sample point and identification, person and company conducting the sampling, sample date and time, and required analyses. The laboratory forms may differ but should include the above listed information.

The sampler should keep a record of all samples collected and show the location of the samples on a sketch of the facility. These records (and sketch) should be kept in afield notebook which should be kept in the project file.

After all necessary containers have been filled, a chain-of-custody form (provided by the laboratory) should be completed. This document should include all the samples collected, with the parameters and analytical methods specified (discussed below). The chain-of-custody form should be signed and dated (along with time relinquished), and sent with the samples to the laboratory. Exhibit 2 shows an example of a completed chain-of-custody document.

The laboratory should be notified approximately two days prior to the sampling to allow time for delivery of the sampling equipment, and should be contacted during the day of the sampling in order to send a courier to pick up the samples or to ensure they know the samples are being delivered by company personnel.

Because of laboratory schedules and sample holding time limitations, sampling should be planned for the early part of the week.

Ensure the lab analyzes the sample and sends the report with the parameters set forth in the permit or regs. For example, if the permit limits are in ppm then the report should state the results in ppm.

SECTION II

Types of Samples

Selection of the type of sample to take is usually directed by the specific permit or regulation. There are generally two different types of samples used in water or waste sampling.

Discrete or Grab Samples - These are samples collected at selected intervals, and each sample is retained separately for analysis. Usually, each sample is collected at a single point in the discharge or storage container.

Composite Samples - Simple composite samples are those made up of a series of smaller samples know as aliquots. These samples should be taken at regular time intervals or locations in the sampling stream or storage device. It is important they be similar in size and content.

Sampling Locations

The proper location for taking a sample is usually the actual discharge point and is very important in ensuring a representative and accurate analysis. It is also necessary to have awareness of the general character of water flows and knowledge of the variability of the pollutant concentration. Some of the considerations necessary in selecting a proper location are:

- Make sure to sample the proper point. For a combined process/stormwater outfall, make sure to sample below the confluence point.
- Be sure the sampling site provides the information desired. This includes familiarity with the water discharge system including inflow and outflow.
- Make sure there is no cross contamination of the sampling stream from othersources, such as fresh water in a stream or other pollutant discharge points.
- Locate the sample point in a straight length of pipe or discharge conveyance(ditch etc.).
- Make sure the sampling point is easily accessible and safe. Areas with turbulent water flows should be avoided.
- Finally. make sure the sample point is in compliance with any permit, regulation or guidance document that lists specific requirements.

SECTION III

Water Sampling

Appropriate Sample

Sample should be collected during a dry period when no rainfall is expected for at least 24 hours

Do not sample within 24 hours prior to a weekend or holiday

General Sampling Guidelines

Use clean latex gloves prior to collection of each sample

Use clean sampling containers between grab sample and each composite sample at each location

Collect samples from the center of the discharge flow channel.

Record all pertinent sampling data on the chain-of-custody.

Use preprinted labels provided in the sampling kit to label each sample container.

Seal, label, bag, and ice down each sample immediately after collection

Make certain the laboratory preserves the samples within 24 hours of collection. Some laboratories ship sample containers already containing the required preservative. Call the lab to discuss any special handling requirements or precautions for preserved samples.

Sample Collection

Collect a grab sample for laboratory analysis of oil and grease and field analysis of temperature and pH.

An additional grab sample will be required for analysis of fecal coliform. After filling the appropriate sample containers for laboratory analysis of fecal coliform and oil and grease, immediately measure the temperature and pH of a portion of the sample, and record all pertinent data in the field notebook.

Collect a composite sample. This process involves collecting a minimum of 8 separate samples at periodic intervals during the operating hours of the facility over a 24 hour period, filling a complete set of sample containers for each sample (samples will be composited by the laboratory), and recording all pertinent sampling information upon completion of sampling.

Quality Assurance/Quality Control

Collect a single field blank from each sampling location at some point during a composite sampling event. This process involves pouring deionized water into a clean sampling device and then pouring this water into the two 40 ml glass vials, label and bag the field blank

sample, and place the sample in an ice chest to accompany the samples to the laboratory. When collecting field blanks, the vials must be completely filled with fluids, allowing no headspace or air bubbles.

Trip blanks are provided by the laboratory with the sample containers. After all samples have been collected, label and bag the trip blank and place one trip blank into each ice chest to accompany the samples to the laboratory.

Sample Analysis

Each grab sample will be analyzed by the laboratory for oil and grease and a portion of the sample will be analyzed for temperature and pH in the field.

Each composite sample will be analyzed by the laboratory for the parameters required by the permit or regulation such as: BTEX, ammonia, total suspended solids, biological oxygen demand (5 day), chemical oxygen demand, and total organic carbon.

Table B-1 of the Sampling and Analysis Plan summarizes the analytical parameters and method numbers to be included on the chain-of-custody form.

Chain-of-Custody Form

For each sampling event, complete the chain-of-custody form (in ink) to include project name and numbers, transportation information and name of the laboratory. For each sample, the chain-of-custody will include: identity of sample, date and time collected, name and significant collector, number of containers, sample matrix, and analytical requirements.

Sample transfers will be evidenced on the chain-of-custody form by signature of the receiver and relinquisher until final delivery to the laboratory. Place the chain of-custody in a plastic (zip lock) bag inside the ice chest to accompany the samples to the laboratory. An example copy of a completed chain-of-custody form is included as Exhibit B-3.

Place the chain-of-custody in a plastic (zip lock) bag inside the ice chest to accompany the samples to the laboratory. An example copy of a completed chain-of-custody form is included as Exhibit A-3.

SECTION IV

EPA Sampling and Analytical Methods

A detailed EPA sampling guidance document is attached.

Surface Waste Management Facilities

A commercial surface waste management facility is a facility that receives compensation for collection, disposal, evaporation, remediation, reclamation, treatment, and/or storage of oil field related wastes. A centralized surface waste management facility is a facility that does not receive compensation for waste management, and is used exclusively by one generator subject to New Mexico's "Oil and Gas Conservation Tax Act" Section 7-30-1 NMSA-1978 as amended; or is used by more than one generator subject to New Mexico's "Oil and Gas Conservation Tax Act" Section 7-30-1 NMSA-1978 as amended under an operation agreement and which receives waste that are generated from two or more production units or areas or from a set of jointly owned or operated leases.

Attachment I is a current list of the commercial surface waste management facilities in the state ofNew Mexico. To construct and operate a commercial waste management facility an application, form C-137 (Attachment II), must be filed with the OCD Santa Fe Office as specified under OCD Rule 711.

Financial assurance is required prior to construction of all surface waste management facilities. Centralized surface waste management facilities shall submit acceptable financial assurance in the amount of $25,000 per facility. Commercial surface waste management facilities shall submit acceptable financial assurance in the amount of the closure cost estimate to be based upon the useof equipment normally available to a third party contractor sufficient to close the facility to protectpublic health and the environment according to the four year or percentage filled, whichever comes first, schedule. The financial assurance shall be in a form approved by the Director (Attachment III). The Division will issue public notice for all surface waste management facilities and allow 30 daysfor comments.

Tab 4a contains the Guidelines for Permit Application, Engineering Design, and Construction of Surface Waste Management Facilities and the accompanying application.

Oil and gas wastes which are exempt from RCRA Subtitle C do not need OCD approval to be disposed of at an OCD authorized surface waste management facility. Oil and gas wastes which are not exempt from RCRA Subtitle C, but which do not exhibit hazardous waste characteristics must receive OCD approval prior to disposal at any surface waste management facility. Either the disposal facility or the waste generator may request OCD approval with a form C-138 (AttachmentIV) to dispose of the wastes at the facility. A blanket approval to dispose of non-exempt, non-hazardous OCD regulated oil and gas waste may be obtained if incorporated into an OCD discharge plan.

Non-oilfield wastes which are not regulated by the OCD may be accepted in an emergency if ordered by the Department of Public Safety. Prior to acceptance, a OCD form C-138 accompanied by the Department of Public Safety order will be submitted to the OCD Santa Fe office and the appropriate District office.

OCD regulated commercial surface waste management facilities may accept wastes from out-of-state on a case-by-case basis. Approval must be requested by the disposal facility, be received prior to disposal and be accompanied by acceptable documentation to determine that the waste is non-hazardous.

Under no circumstance will an OCD regulated surface waste management facility accepthazardous wastes.

ATTACHMENT I
COMMERCIAL SURFACE WASTE MANAGEMENT FACILITIES

SOUTHEAST

COMPANY	ORDER/PERMIT NO	LOCATION	WASTE	DATE
AA Oilfield Services Inc	R-7333	S3 T19S R37E	PW TP	1983
C & C	R-9769-A / 711-01-0012	S03 T20S R37E	LF	1993
Chaparral	----	S17 T23S R37E	PW TP	1995
Controlled Recovery Inc.	R-9166 /711-01-0006	S27 T20S R32E	PW TP S M	1990
EPI	711-01-0013	S15 T22s R37E	LF	1993
ESSR	----	S01 T26S R31E	LF	1993
Gandy Corp.	R-4594	S11 T10S R35E	PW TP	1973
Gandy Marley Inc	711-01-0019	S04 T11S R31E	LF	1995
GooYea	711-01-0015	S14 T11S R38E	LF	1995
Jenex Operating Co.	----	S14 T20S R38E	PW TP	1993
Kelly Maclaskey	----	S16 T20S R37E	PW TP	1992
Kenneth Tank Services	R-8167	S35 T09S R35E	TP	1986
Loco Hills	R-6811-A	S16 T17S R30E	PW TP	1982
Sundance	R-6940 / 711-01-0003	S29 T21S R38E	PW TP S M	1982
Watson	R-6095	S34 T08S R35E	TP	1979

NORTHWEST

COMPANY	ORDER/PERMIT NO	LOCATION	WASTE	DATE
Basin Disposal	711-01-0005	S03 T29N R11W	PW TP	1985
Envirotech No. 2	711-01-0011	S06 T26N R10W	LF	1992
Sunco	R-9485-A	S02 T29N R12W	PW TP	1991
TNT Construction	711-01-0008	S08 T25N R03W	PW TP LF	1990
Tierra Environmental Inc	R-9772 / 711-01-0010	S02 T29N R12W	LF	1992

PW - Produced Water
TP - Waste Oil Treating Plant
S -- Solids
LF - Landfarm (Solids)
M - Drilling Muds

IN NEW MEXICO

AA OILFIELD SERVICES, INC.
P.O. Box 5208
Hobbs, NM 88241

BASIN DISPOSAL, INC.
P.O Box 100
Aztec, New Mexico 87410
(505) 325- 6336

C&C LANDFARM
Box 55
Monument, N. Mex.
(505) 397-2045

CHAPARRAL TREATING PLANT
P.O. Box 1769
Eunice, NM 88231
(505) 394-2545

CONTROLED RECOVERY, INC.
P.O Box 369
Hobbs, N.M. 88241
(505) 393-1079

ENVIRONMENTAL PLUS, INC.
601 W Illinois
Hobbs N.M. 88240

ENVIROTECH, INC.
5796 U.S. Highway 64-3014
Farmington, NM 87401

ESSR INC.
208 W. Stevens
P.O. Box 1387
Carlsbad, N.M. 88220
(505) 885-2353

GANDY CORP.
1109 East Broadway
P.O. Box 827
Tatum, NM 88267
(505) 398-4960

GANDY MARLEY, INC.
Box 1658
Roswell, N.M. 88202
(505) 625-9026

GOO YEA
4007 Lovington Highway
Hobbs, N.M.
(505) 392-4498

JENEX OPERATING
P.O. Box 308
Hobbs, NM 88241
(505) 397-3360

KELLY MACLASKEY OILFIELD SERVICES, INC.
P.O. Box 580
Hobbs, NM 88241
(505) 393-1016

KENNETH TANK SERVICES, INC.
P.O. Box 100
Crossroads, NM 88114

LOCO HILLS WATER DISPOSAL
8426 N. Dal Paso
Hobbs, N.M. 88240
(505) 667-2118

SUNDANCE SERVICES, INC.
P.O. Box 1737
Eunice, N.M. 88231
(505) 394-2511

SUNCO WATER DISPOSAL
P.O. Box 443
Farmington, N.M. 87499
(505) 327-0416

TNT CONSTRUCTION
HCR 74 Box 115
Lindrith N.M. 87029
(505) 774-6663

TIERRA ENVRONMENTAL COMPANY, INC.
420 CR 3100
Aztec, N.M. 87410
(505) 334-8894

WATSON TREATING PLANT, INC
P.O. Box 75
Tatum, NM 88267
(505)398-3490

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

PART 1
GENERAL INFORMATION

1. Name of facility: **Versado Gas Processors – New Mexico and Texas Facilities**

2. Type of facility: **Onshore facilities –Natural Gas Processing Plants and associated compressor stations**

3. Location of facility: **See attached Data Sheets**

4. Name and address of owner or operator:

Dynegy Midstream Services, Limited Partnership (operator)

1000 Louisiana Street
Suite 5800
Houston, Texas 77002

5. Designated person accountable for oil spill prevention for Dynegy Midstream Services, Limited Partnership:

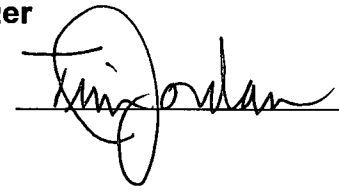
Area Managers **Mike Hicks – South Versado (Eunice, Monument Area)**
Tim Jordan- North Versado (Saunders Area)

6. Facility experienced a reportable oil spill event during the twelve months prior to January 10, 1974 (effective date of 40 CFR, Part 112). (If YES, complete Attachment #1.): **No**

MANAGEMENT APPROVAL AND COMMITMENT OF MANPOWER

This SPCC Plan will be implemented as herein described. I hereby commit the necessary manpower, equipment and materials required to expeditiously control and remove any harmful quantity of oil discharged.

Area Manager

Signature: 

SPCC CERTIFICATION

I hereby certify that I have examined the facilities identified below and on the attached Data Sheets, and being familiar with the provisions of 40 CFR, Part 112, attest that this SPCC Plan has been prepared in accordance with good engineering practices.

Russell S. Dykes, P.E.
Printed Name of Registered Professional

Signature of Registered Professional Engineer

Date: October 18, 1999 Registration No.: 55886 State: TX

APPLICABILITY OF THE SUBSTANTIAL HARM CRITERIA CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

_____

Signatures

_____

Data Sheets attached:

North Eunice Plant	
Middle Eunice Plant	
South Eunice Plant	Grobe Compressor Station
	Teague Switch Compressor Station
Monument Plant	Buckeye Compressor Station
	Joy Compressor Station
	Skaggs-McGee Compressor Station
Saunders Plant	Bluitt Booster
	Cato Compressor Station
	Clauene Compressor Station
	Dean Compressor Station
	Epperson Compressor Station
	King Compressor Station
	Lehman Compressor Station
	Plains Compressor Station
	Sawyer Compressor Station
	Tokio Compressor Station
	Townsend Compressor Station
	Vada Compressor Station

Environmental Incidents / Spill Reporting

If an environmental incident occurs at a Dynegy facility (this could be a fire, an explosion, a release of regulated materials from a tank, etc.), refer to the Dynegy "Safety and Environmental Incident Reporting Procedures" Manual ("Orange Book"), Section X – Environmental Incident Reporting Procedures.

For materials spills and releases:

Federal and State regulations require agency reporting if a release in which more than the "reportable quantity" of a regulated material occurs during a 24-hour period. These regulations require reporting within a limited time period (usually less than 24 hours after the spill occurs). Reportable Quantities are listed in Section X of the "Orange Book". If you fill out a spill report which is to be sent to a state or federal agency, the report should be routed through your regional EHS Advisor before sending it to the applicable agency(s).

For additional information concerning environmental incidents, refer to the "Orange Book" or call your regional EHS advisor or the Dynegy Midstream Services Environmental, Safety and Health Team in Houston:

Name	Telephone
Shankar	(713)507-6753
Bob Cinq-Mars	(713)507-3993
Russell Dykes	(713)767-0072
Mike Howerton	(713)507-3723
Paul Lankford	(713)507-3729
J.D. Morris	(713)507-6752
Kathy Silva	(713)507-3998
Mike Terrell	(713)507-6755

Amendment / Periodic Review of SPCC Plans

The owner/operator of a facility is required to review the SPCC Plan at least once every three years. The plan must be amended whenever a change in the facility "materially affects the facility's potential for discharge of oil...", or when new technology provides a more effective means of preventing oil discharge. If the plan is amended (not just reviewed), the amended plan must be recertified by a professional engineer.

The actual text of the regulation is as follows:

40 CFR 112.5 Amendment of Spill Prevention Control and Countermeasure Plans by owners or operators.

(a) Owners or operators of facilities subject to §112.3 (a), (b) or (c) shall amend the SPCC Plan for such facility in accordance with §112.7 whenever there is a change in facility design, construction, operation or maintenance which materially affects the facility's potential for the discharge of oil into or upon the navigable waters of the United States or adjoining shore lines. Such amendments shall be fully implemented as soon as possible, but not later than six months after such change occurs.

(b) Notwithstanding compliance with paragraph (a) of this section, owners and operators of facilities subject to §112.3 (a), (b) or (c) shall complete a review and evaluation of the SPCC Plan at least once every three years from the date such facility becomes subject to this part. As a result of this review and evaluation, the owner or operator shall amend the SPCC Plan within six months of the review to include more effective prevention and control technology if:

(1) Such technology will significantly reduce the likelihood of a spill event from the facility, and

(2) if such technology has been field-proven at the time of the review.

(c) No amendment to an SPCC Plan shall be effective to satisfy the requirements of this section unless it has been certified by a Professional Engineer in accordance with §112.3(d).

The attached form provides the facility with a means of recording the dates when the plan is reviewed, a space to describe periodic administrative (e.g., name changes, personnel changes, etc.) changes made to the plan and a signature line for the facility manager to attest that the review has been completed (or the administrative change made) and no significant changes were made in the plan. Use the attached form (or additional copies thereof) to record these periodic reviews and / or administrative changes to the plan.

PART I
GENERAL INFORMATION
Page 6

Periodic Review / Administrative Change Record

Facility _____

Date	Review (#)	Admin. Change (#)	Description	Signature

By placing their signature on the form above, the person signing attests that the SPCC Plan review or administrative change described did not result in a change which materially affects the facility's potential for discharge of oil to waters of the United States.

PART I
GENERAL INFORMATION
Page 7

7. Potential Spills -- Prediction & Control

Source	Major Type of Failure	Total Quantity (bbls)	Rate (bbls/hr)	Direction of Flow*	Secondary Containment

See attached Data Sheets

***See maps on attached data sheets**

Discussion:

See attached Data Sheets

8. Containment or diversionary structures or equipment to prevent oil products from reaching navigable waters are practicable. (If NO, complete Attachment #2.)

Yes, for tanks.

9. Inspections and Records

A. The required inspections follow written procedures. **Yes**

B. The written procedures and a record of inspections, signed by the appropriate supervisor or inspector, are attached.

Written procedures are discussed below. Records of inspections that are signed by the appropriate inspector are in the Facility files.

Discussion:

In order to minimize the potential for spills, all areas used for storage of petroleum material will undergo inspection periodically. Periodic inspections are conducted for visual leaks and/or deficiencies and the results are recorded on an inspection log. All above-ground equipment and facilities as listed are located in such a manner that routine visual checks and maintenance may be performed with little difficulty. All tank levels are gauged prior to pumping product into them. Tanks are visually monitored as well. Conditions needing maintenance such as leaks or defective conditions are reported to the Asset Office. Applicable repairs are initiated promptly. The procedures are as follows:

A. Tank Inspections - Tank inspections include checks for leaks and spills. Sudden deviations in tank volumes will be investigated and their causes determined.

B. Material Dispensing Equipment Inspections - The dispensing hoses, connections, valves, pumps, pipes, and fittings are inspected for damage or wear, such as cracks or leaks, and proper functioning.

C. Secondary Containment Areas Inspections - Secondary containment areas are inspected for deterioration, cracks, leaks or failure.

In addition to the above, the following are inspected but not recorded on the annual inspection log:

D. Safety Equipment Inspections - Fire extinguishers are checked monthly to ensure that the units are charged and accessible.

E. Security Inspections - Gates, fences, lighting, and signs are inspected for damage and proper operation.

10. Personnel, Training, and Spill Prevention Procedures

A. Personnel are properly instructed in the following:

(1) operation and maintenance of equipment to prevent oil discharges, **Yes**

(2) and applicable pollution control laws, rules and regulations. **Yes**

Describe procedures employed for instruction:

All personnel potentially involved with the use of petroleum products are appropriately trained and know to comply with company incident reporting procedures in the event of a spill. Formal training is conducted once a year. New employees are trained by experienced operators prior to assuming duty.

Personnel training includes instruction concerning the proper operation and maintenance of equipment. In particular, this training ensures that all personnel have an adequate understanding of the intent and contents of the SPCC Plan and the spill prevention and response procedures. Employees who are responsible for containing and/or stopping spills have spill response training.

Each employee signs training documentation/sign-off sheets, and a training file is maintained at the Asset Office.

B. Scheduled prevention briefings for the operating personnel are conducted frequently enough to assure adequate understanding of the SPCC Plan. **Yes**

Describe briefing program:

Training also continues on a regular basis through such means as on-the-job training, regularly scheduled operating and safety meetings, when regulations and/or procedures change, and with annual refresher training. A copy of the SPCC Plan is provided in the control room and the office for operator reference. Emergency phone numbers are provided for plant personnel.

PART II
DESIGN AND OPERATING INFORMATION

A. Facility Drainage

1. Drainage from secondary containment areas is controlled as follows (include operating description of valves, pumps, ejectors, etc.). (Note: Flapper-type valves should not be used):

See attached Data Sheets

For dikes that have drains, accumulated storm water in the diked areas will be removed by opening a secured valve on a pipe through the dike if no oil is present. For dikes that do not have drains, the storm water will be allowed to evaporate or percolate into the soil.

2. Drainage from undiked areas is controlled as follows (include description of ponds, lagoons, or catchment basins and methods of retaining and returning oil to facility):

See attached Data Sheets

3. The procedure for supervising the drainage of rain water from secondary containment into a storm drain or an open watercourse is as follows (include description of: (a) inspection for pollutants, and (b) method of valving security). (A record of inspection and drainage events is to be maintained on a form similar to Attachment #3):

The presence of hydrocarbons will be identified by the presence of a sheen. Any oil, or water with a sheen of oil, that is collected within a dike, a berm or a low-lying area will be removed by means such as sorbent pads or vacuum trucks to one of the tanks on-site or to a company-approved disposal facility.

For those dikes that have drains, the rain water drains are kept closed and secured except during drainage of storm water. For those berms that have drains, the rain water drains are kept closed except during drainage of storm water. A record of drainage is kept which shows the time of discharge, presence or absence of a sheen, and personnel performing the discharge. Any drainage of water from the dike or berm to the surrounding countryside is done by an SPCC-trained employee.

B. Bulk Storage Tanks

1. Describe tank design, materials of construction, fail-safe engineering features, and if needed, corrosion protection:

See attached Data Sheets

All storage tanks are welded steel, meet API specifications and are surrounded by a containment dike. Each storage tank is equipped with vacuum pressure release valves to prevent rupture of the tanks from collapsing of the tanks due to vacuum while removing liquids.

Tanks are primed and painted to inhibit rust and corrosion. All tank integrity and leak tests performed on tanks and associated piping will be maintained at the Asset Office.

2. Describe secondary containment design, construction materials, and volume:

See attached Data Sheets

Secondary containment is provided for all storage tanks by containment dikes. The dike dimensions are sufficient containment to impound the capacity of the largest tank plus rainfall from a 25-year, 24-hour storm event, unless otherwise indicated on the site-specific Data Sheets. The SPCC tank dike calculations are attached to the site-specific Data Sheets.

3. Describe tank inspection methods, procedures, and record keeping:

See General Information, Inspections and Records, Item 9.

4. Internal heating coil leakage is controlled by one or more of the following control factors:

a. Monitoring the steam return or exhaust lines for oil: **N/A**

Describe the monitoring procedure. **N/A**

b. Passing the steam return or exhaust lines through a settling tank, skimmer, or other separation system. **N/A**

c. Installing external heating systems. **N/A**

5. Disposal facilities for plant effluents discharged into navigable waters are observed frequently for indication of possible upsets which may cause an oil spill event. **N/A**

Describe method and frequency of observation: **N/A**

C. Facility Transfer Operations and Pumping

1. Corrosion protection for buried pipelines:

a. Pipelines are wrapped and coated to reduce corrosion. **Yes**

b. Cathodic protection is provided for pipelines if determined necessary by electrolytic testing. **Yes**

c. When a pipeline section is exposed, it is examined and corrective action taken as necessary. **Yes**

2. Pipeline terminal connections are capped or blank-flanged and marked if the pipeline is not in service or on standby service for extended periods. **Partial**

Describe criteria for determining when to cap or blank-flange:

Product Pipelines are capped or blinded when purged and disconnected from the facility. Marking of in-service lines is done but marking of abandoned lines is not done.

3. Pipe supports are designed to minimize abrasion and corrosion and allow for expansion and contraction. **Yes**

Describe pipe support design:

ANSI Code B31.3 design is utilized. Pipe supports and pipes are provided with guide shoes and guides to provide for expansion where applicable. Expansion loops are provided on lines where extraordinary expansion and contraction occur. Other piping is held in place by U-bolts or pipe clamps.

4. Describe procedures for regularly examining all above-ground valves and

pipelines (including flange joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces):

Inspections of above-ground valves, flanges and pipelines are made by operating personnel as part of their operating procedure.

5. Describe procedures for warning vehicles entering the facility to avoid damaging above-ground piping:

Unauthorized access to the facility is limited. Unauthorized vehicles are not allowed in the Facility. Authorized vehicles are either accompanied by plant personnel or directed to drive in specific areas. Barricades are used to protect piping in high traffic areas.

D. Facility Tank Car & Tank Truck Loading/Unloading Rack
Tank car and tank truck unloading occurs at the facility. (If yes, complete 1 through 5 below.)

See attached Data Sheets

1. Unloading procedures meet the minimum requirements and regulations of the Department of Transportation. **See attached Data Sheets**

2. The unloading area has a quick drainage system. **See attached Data Sheets**

3. The containment system will hold the maximum capacity of any single compartment of a tank truck unloaded in the plant. **See attached Data Sheets**

Describe containment system design, construction materials, and volume:

See attached Data Sheets

4. An interlocked warning light, a physical barrier system, or warning signs are provided in loading/unloading areas to prevent vehicular departure before disconnect of transfer lines. **See attached Data Sheets**

Describe methods, procedures, and/or equipment used to prevent premature vehicular departure:

See attached Data Sheets

5. Drains and outlets on tank trucks and tank cars are checked for leakage before unloading or departure.

E. Security

1. Plants handling, processing, or storing oil products are fenced. **Yes**

2. Entrance gates are locked and/or guarded when the plant is unattended or not in production. **Yes**

3. Any valves which permit direct outward flow of a tank's contents are locked closed when in non-operating or standby status. **Yes**

4. Starter controls on all oil product pumps in non-operating or standby status are:

   a. locked in the off position; **No**

   b. located at site accessible only to authorized personnel. **Yes**

5. Discussion of items 1 through 4 as appropriate:

The Facility is remotely operated 24 hours per day. The entrance gate is locked unless personnel are working at the site. Likewise, all storage valves are considered operative 24 hours per day and are not locked.

6. Discussion of lighting around the facility:

The area is adequately lighted such that problems and intruders can easily be detected.

NOT APPLICABLE

SPCC PLAN, ATTACHMENT #1
SPILL HISTORY

(Complete this form for any reportable spill(s) which has (have) occurred from this facility during the twelve months prior to January 10, 1974, into _____ navigable water.)

1. Date_____ Volume _____ Cause: _____

_____

_____

_____

_____

Corrective action taken: _____

_____

_____

_____

Plans for preventing recurrence: _____

_____

_____

_____

_____

_____

2. Date_____ Volume _____ Cause: _____

_____

_____

_____

_____

Corrective action taken: _____

_____

_____

_____

_____

Plans for preventing recurrence: _____

_____

_____

_____

_____

_____

SPCC PLAN, ATTACHMENT #2
OIL SPILL CONTINGENCY PLANS AND
WRITTEN COMMITMENT OF MANPOWER

Secondary containment or diversionary structures are impracticable for the following reasons (attach additional pages if necessary):

A spill in the unloading areas would be caught immediately since the driver/gauger is in attendance during the entire loading procedure. Since the Facility has control over when unloading may occur, the Facility has adopted a policy that product won't be unloaded in a driving 25-year storm event, when the berm is standing full of rainwater.

The no-spills history of these sites supports the conclusion that safe operating practices are effective at these sites. Potential spills at the loading/unloading areas are addressed by a strong Spill Response Plan. Alleviation of a possible spill relies on experienced and capable operators to prevent premature vehicular departure before disconnection of transfer lines. Drains and outlets on tank trucks are checked for leakage before loading/unloading or departure. Equipment and hoses are inspected for deterioration, frays, leaks, breaks, etc., and qualified personnel are present during loading and unloading to respond to any spill of material. The qualified person ensures that the hand break is set and that the wheels are chocked. He also ensures that no smoking or other ignition sources are present in the area.

Company personnel have vehicles equipped with two-way radio communication systems, which facilitates proper implementation of the SPCC plan by allowing immediate spill reporting. All Facilities are serviced by an all-weather road whereby ample manpower and equipment may be promptly dispatched to contain or divert any possible oil spill. Equipment and manpower is available within two hours' notice to effectively dam up, divert, and clean up spills that may occur. The names and telephone numbers of contractors with proper spill control equipment are listed in the Spill Response Plan.

A strong oil spill contingency plant is attached?
Spill Response Plan is at the Asset Office.
A written commitment of manpower is attached?
Yes, See first page of General SPCC Plan.

EXAMPLE - ONLY

SPCC PLAN, ATTACHMENT #3
ONSHORE FACILITY BULK STORAGE TANKS
DRAINAGE SYSTEM

Inspection Procedure:

_____

_____

_____

_____

_____

_____

_____

Record of drainage, bypassing, inspection, and oil removal from secondary containment:

Date of Drainage	Date of Bypassing		Date of Inspection	Oil Removal	Supervisor's or Inspector's Signature
	Open	Closed			

Saunders – Vada Compressor Station
DATA SHEET

PART I
GENERAL INFORMATION

1. Name of facility: **Saunders – Vada Compressor Station**

3. Location of facility: **Approximately 15 miles west of Tatum, NM on U.S. Highway 380, turn north on Nine Mile Ranch Road (south extension is NM 457) to Epperson Road (where pavement ends). Turn right and proceed approximately 3.3 miles to Vada (east side of road).**

7. Potential Spills -- Prediction & Control: **See Table 1.**

Discussion:
The map referred to in the Generic SPCC Plan is attached here as Figure 1.

8. Containment or diversionary structures or equipment to prevent oil from reaching navigable waters are practicable: **Yes, for tanks.**

PART II
DESIGN AND OPERATING INFORMATION

A. Facility Drainage

2. Drainage from undiked areas is controlled as follows (include description of ponds, lagoons, or catchment basins and methods of retaining and returning oil to facility):

Drainage from undiked areas generally flows to the southwest. Any oil released to this area will be absorbed with booms or other similar equipment.

B. Bulk Storage Tanks

2. Describe secondary containment design, construction materials, and volume:

All tanks within the plant are located inside concrete or fiberglass secondary containment structures. Containment structures are generally designed to hold the capacity of the largest tank within the structure plus excess capacity for the 25-year, 24-hour rainfall event. Dimensions of all containment structures are listed in Table 1. Capacities of these structures are calculated in Table 2.

D. Facility Tank Car & Tank Truck Unloading Rack
Tank car and tank truck unloading occurs at the facility. **Yes**

1. Unloading procedures meet the minimum requirements and regulations of the Department of Transportation **Yes**

2. The unloading area has a quick drainage system. **N/A**

3. The containment system will hold the maximum capacity of any single compartment of a tank truck unloaded in the Facility:
N/A

Describe containment system design, construction materials, and volume:

N/A

4. An interlocked warning light, a physical barrier system, or warning signs are provided in loading/unloading areas to prevent vehicular departure before disconnect of transfer lines. **Yes, signs are provided at each facility and contractors are required to follow the following procedure.**

Describe methods, procedures, and/or equipment used to prevent premature vehicular departure:

- ☐ Contractors are responsible for wearing appropriate Personal Protective Equipment (PPE) required by facility (hard hat, safety glasses, fire retardant clothing). If driver is unfamiliar with the product being loaded, obtain a Material Safety Data Sheet (MSDS) from Dynegy.
- ☐ Truck driver to call local Dynegy personnel before beginning loading/unloading operation described below.
- ☐ Driver pulls truck to designated loading/unloading area with approval from local Dynegy personnel.
- ☐ With truck shut down, driver will attach ground cable and chock wheels.
- ☐ Driver will visually inspect hoses for cracks or defects. If no defects are noted, driver will attach hoses and assure that connections are secure.
- ☐ Record meter reading (where applicable) or gauge tank level prior to loading or unloading.
- ☐ Remove padlocks from valves where applicable.
- ☐ Open valves required to load or unload.
  After the tank is full (or empty) gauge the tank (or read the meter). Record the readings and reverse the procedure above.
- ☐ Driver to fill out appropriate DOT paperwork and provide receipt ticket/copy of paperwork to Dynegy.
- ☐ If a spill occurs during the loading/unloading operation, call the local Dynegy representative immediately at the emergency number shown on the facility sign.

5. Drains and outlets on tank trucks and tank cars are checked for leakage before unloading or departure. **Yes**

Attachments:
Site Plan – Figure 1
Table 1 – Potential Spills – Prediction and Control
Figures 2-8 (Tank photographs)
Applicability of the Substantial Harm Criteria
Table 2 - Dike Calculations.

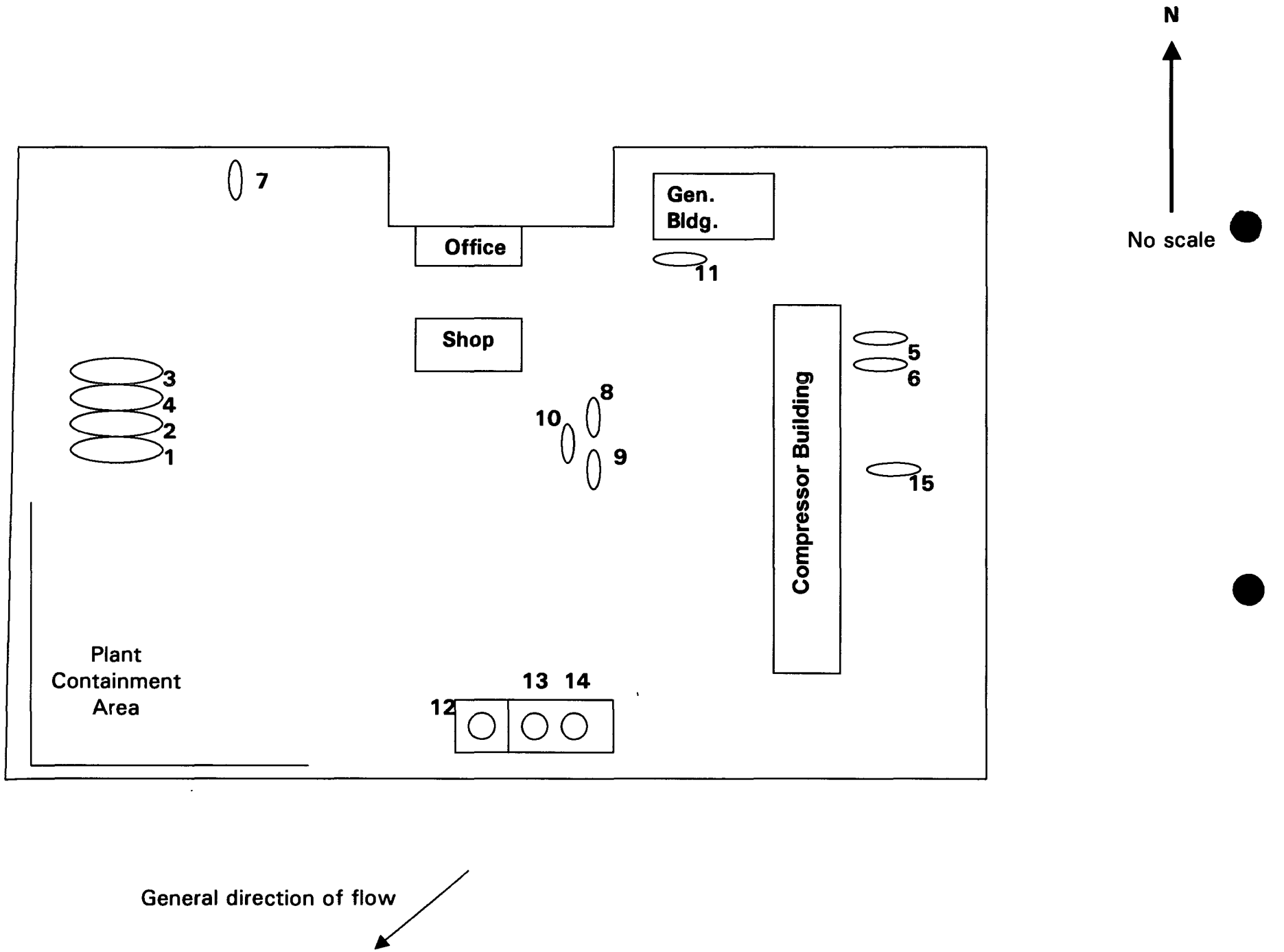

N
No scale
7
Gen.
Bldg.
Office
11
Shop
3
4
2
1
10
8
9
Compressor Building
5
6
15
Plant
Containment
Area
13 14
12
General direction of flow

Table 1
Potential Spills – Prediction and Control

Vessel Number	Contents	Major Type of Failure	Total Quantity (gal)	Direction of Flow	Secondary Containment	Figure No.
1	Condensate	Overfill / rupture	34,261	SW	Plant containment area 300' x 126' x 1'6"	2
2	Condensate	Overfill / rupture	34,261	SW	Plant containment area 300' x 126' x 1'6"	2
3	Condensate	Overfill / rupture	34,261	SW	Plant containment area 300' x 126' x 1'6"	2
4	Condensate	Overfill / rupture	34,261	SW	Plant containment area 300' x 126' x 1'6"	2
5	Engine oil	Overfill / rupture	12,400	SW	Plant containment area 300' x 126' x 1'6"	3
6	Engine oil	Overfill / rupture	Not used	SW	Plant containment area 300' x 126' x 1'6"	3
7	Gasoline	Overfill / rupture	2,000	SW	Plant containment area 300' x 126' x 1'6"	4
8	Methanol	Overfill / rupture	580	SW	Plant containment area 300' x 126' x 1'6"	5
9	Methanol	Overfill / rupture	1,000	SW	Plant containment area 300' x 126' x 1'6"	5
10	Methanol	Overfill / rupture	522	SW	Plant containment area 300' x 126' x 1'6"	5
11	Solvent	Overfill / rupture	300	SW	Concrete dike 6' x 9' x 1'	6
12	Slop oil	Overfill / rupture	8,400	SW	Earth berm 39' x 33' x 1'6"	7
13	Slop oil	Overfill / rupture	8,820	SW	Earth berm 45' x 57' x 1'6"	7
14	Slop oil	Overfill / rupture	12,600	SW	Earth berm 45' x 57' x 1'6"	7
15	Solvent	Overfill / rupture	1,127	SW	Concrete dike 9' x 30' x 8"	8

Note: the entire facility drains to the "plant containment area" in the southwest corner of the property. Some of the tanks on site have separate individual containments to locally contain any spills. However, every tank on the site ultimately drains to the plant containment area, should the local containment be overtopped.

Figure 2 – Condensate tanks

Figure 3 – Engine Oil (two left) and Cooling Water Tanks

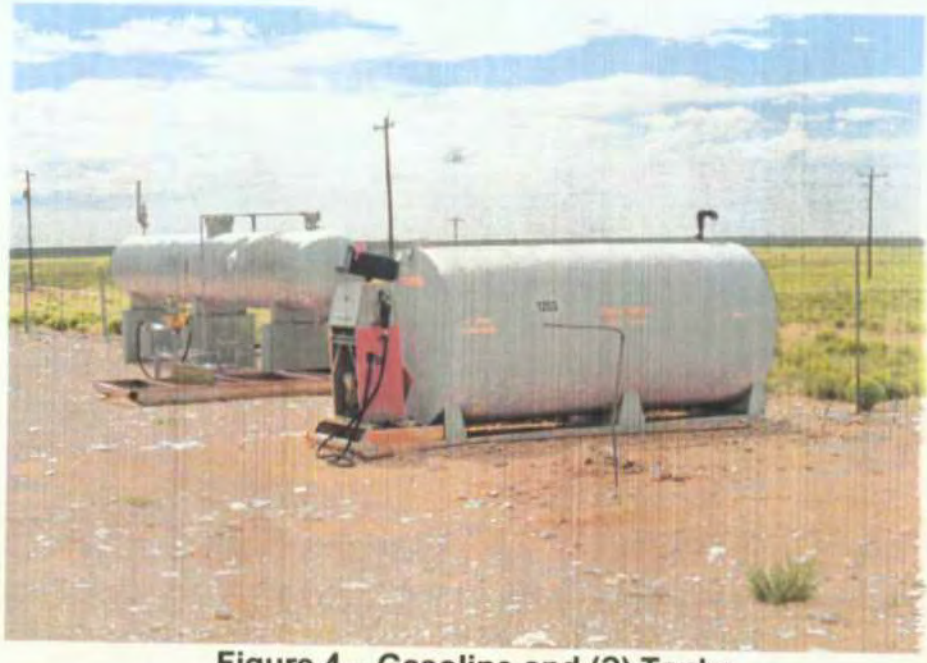


Figure 4 – Gasoline and (?) Tanks

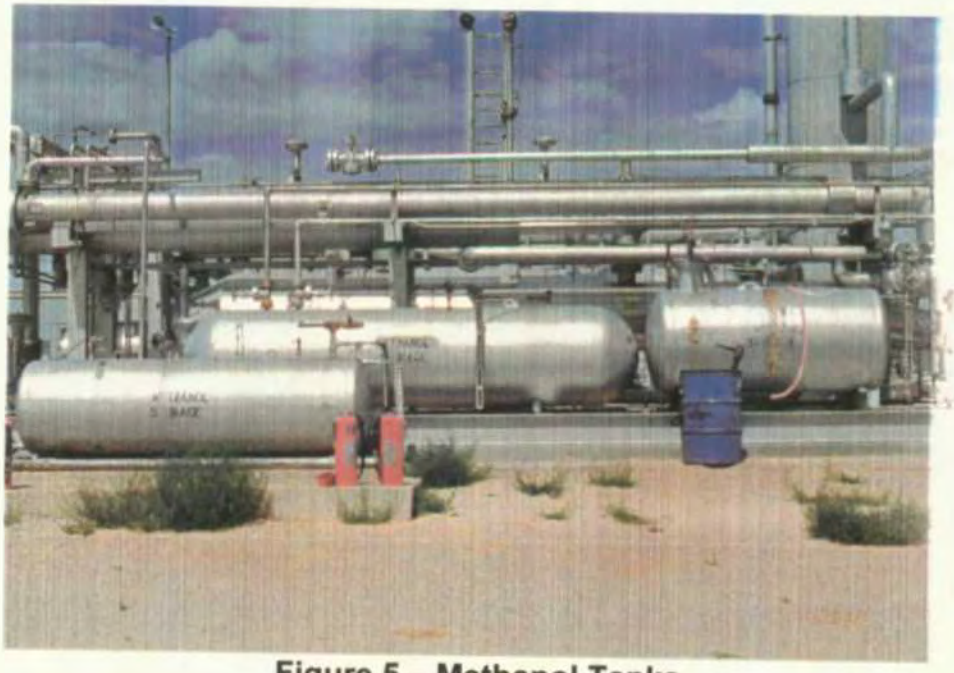


Figure 5 – Methanol Tanks

Figure 6 – Solvent Tank

Figure 7 – Slop Oil Tanks

Figure 8 – Solvent (left), Soap and Corrosion Inhibitor Tanks

Applicability of Substantial Harm Criteria

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons? **No**

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area? **No**

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula1) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? **No**

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake? **No**

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years? **No**

Dike Calculations
Saunders – Vada Compressor Station

Tank / Dike Combination	Dike Full Storage Volume (see Table 1 for dimensions), gal.	Largest Tank capacity (gal)	Available Dike Full Precipitation Storage (in.)
1-10	424,100	34,261	16.5
11	404	300	3.0
12	14,440	8,400	7.5
13,14	28,779	12,600	10.1
15	1,346	1,127	1.3

Targa Midstream Services Limited Partnership

6 Desta Dr., Suite 3300
Midland, Texas 79705
432-688-0555
www.targaresources.com

December 20, 2005
Mr. Roger Anderson
Environmental Bureau Chief
Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505

RE: GW-027
Vada Compressor Station
Discharge Plan Renewal

Dear Sir:

This letter is to notify the agency as per Condition 8 and 9 of the Renewal Conditions for the Vada Compressor Station, dated September 29, 2005. The drain system integrity tests will begin on December 28, 2005. The sump will be drained, cleaned, and visually inspected for cracks and the drain lines to the sump will be pressure tested to 3-5 psi with an air/water mixture for a 15 minute period to ensure integrity.
Please call with any questions or concerns. (432) 688-0542.

Sincerely,

Cal Wrangham
Targa Midstream Services
Environmental, Safety, and Health

Cc: Chris Williams/ OCD Hobbs
Wayne Price/ OCD Santa Fe
Tim Jordan/ Saunders Area Manager

THE SANTA FE
NEW MEXICAN
Founded 1849

RECEIVED
JUL 19 2005
OIL CONSERVATION DIVISION

NM OIL CONSERVATION DIV
Attn: Wayne Price
1220 ST. FRANCIS DR

SANTA FE NM 87505

ALTERNATE ACCOUNT: 56689
AD NUMBER: 00128346 ACCOUNT: 00002212
LEGAL NO: 77405 P.O. #: 06-199-050125
337 LINES 1 TIME(S) 148.28
AFFIDAVIT: 5.50
TAX: 11.63
TOTAL: 165.41

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, B. Perner, being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication # 77405 a copy of which is hereto attached was published in said newspaper 1 day(s) between 07/15/2005 and 07/15/2005 and that the notice was published in the newspaper proper and not in any supplement; the first date of publication being on the 15th day of July, 2005 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/ B Perner
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 15th day of July, 2005

Notary Laura E. Harding

Commission Expires: 11/23/07

Affidavit 7/29/05
W/in scp

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 permit application(s) has been submitted to the Director of the Oil Conservation Division, 1220 S. Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

NOTICE OF PUBLICATION

(GW-25) Dynegy Midstream Services, LP, Cal Wrangham, 6 Desta Drive, Suite 3300, Midland, Texas 79705, has submitted a renewal application for the previously approved discharge plan for their Monument Gas Processing Plant located in SW/4, Section 36, Township 19 South, Range 36 East, NW/4, Section 1, Township 20 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 42,000 gallons per day of wastewater is disposed of in an OCD approved Class II injection well. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 35 to 60 feet with a total dissolved solids concentration ranging from 500 to 3,000 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

(GW-26) Dynegy Midstream Services, LP, Cal Wrangham, 6 Desta Drive, Suite 3300, Midland, Texas 79705, has submitted a renewal application for the previously approved discharge plan for their Saunders Gas Processing Plant located Section 34, Township 14 South, Range 33 East, NMPM, Lea County, New Mexico. Approximately 18,900 gallons per day of process wastewater is disposed of in an OCD approved Class II injection well. The wastewater has a total dissolved solids concentration of approximately 3881 mg/l. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 100 feet with a total dissolved solids concentration of approximately 600 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

(GW-27) Dynegy Midstream Services, LP, Cal Wrangham, 6 Desta Drive, Suite 3300, Midland, Texas 79705, has submitted a renewal application for the previously approved discharge plan for their Vada Compressor Station located in Section 23, Township 10 South, Range 33 East, NMPM, Lea County, New Mexico. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 35 feet with a total dissolved solids concentration of approximately 1000 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge permit application and draft discharge permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. The draft discharge permit may also be viewed at OCD's web site http://www.emnrd.state.nm.us/ocd/. Prior to ruling on any proposed discharge permit 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 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 permit based on information available. If a public hearing is held, the director will approve or disapprove the proposed permit based on information in the permit and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 8th day of July 2005.

STATE OF
NEW MEXICO
OIL CONSERVATION
DIVISION

SEAL

Mark Fesmire,
Director

Legal #77405
Pub. July 15, 2005

Dynegy Midstream Services, Limited Partnership
6 Desta Drive, Suite 3300
Midland, TX 79705
Phone 432-688-0555
Fax 432-688-0552
www.dynegy.com

RECEIVED
JUN 2 8 2005
OIL CONSERVATION
DIVISION

DYNEGY

June 13, 2005

Wayne Price
Environmental Engineer
Oil Conservation Division
1220 S. St. Francis Dr.
Santa Fe, New Mexico 87505

Discharge Plan GW-027 Renewal
Vada Compressor Station

Dear Sir:

Dynegy Midstream Services, L. P. would like to renew the Vada Compressor Station Discharge Plan as required by WQCC Sec. 3106.

Please find the attached the renewal form and a check in the amount of $100.00, which constitutes the filing fee for the Discharge Plan renewal.

Please call me with any questions, Office (432) 688-0542 Cell (432) 425-7072.

Sincerely,

Cal Wrangham
Permian Basin Region ES&H Advisor

Cc: Mr. Chris Williams, Hobbs District 1 Office

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

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

Revised June 10, 2003

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

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

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

☐ New ☒ Renewal ☐ Modification

1. Type: Vada Compressor Station

2. Operator: Dynegy Midstream Services, L. P.

   Address: PO Box 1689 Lovington, NM (15 miles West of Tatum on Hwy 380, turn North on 9 Mile Ranch Road, turn right where pavement ends on 9 Ranch Road and go 3.3 miles to Vada)

   Contact Person: Cal Wrangham Phone: (432) 688-0542

3. Location: NW /4 /4 Section 23 Township 10 South Range 33 East
   Submit large-scale topographic map showing exact location.

4. Attach the name, telephone number and address of the landowner of the facility site. **See on file at OCD**

5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility. **See on file at OCD**

6. Attach a description of all materials stored or used at the facility. **See on file at OCD**

7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of wastewater must be included. **See on file at OCD**

8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures. **See on file at OCD**

9. Attach a description of proposed modifications to existing collection/treatment/disposal systems. **See on file at OCD**

10. Attach a routine inspection and maintenance plan to ensure permit compliance. **See on file at OCD**

11. Attach a contingency plan for reporting and clean-up of spills or releases. **See on file at OCD**

12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included. **See on file at OCD**

12. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders. **See on file at OCD**

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

Name: Cal Wrangham Title: ES&H Specialist

Signature: Date: June 13, 2005

E-mail Address: cwwr@dynegy.com

NOTICE OF PUBLICATION

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 8th day of July 2005.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

S E A L

Mark Fesmire, Director

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

DYNEGY

September 18, 2001

Mr. Roger Anderson
Environmental Bureau Chief
Oil Conservation Division
1220 S. St. Francis
Santa Fe, NM 87505

RE: GW-027
Vada Compressor Station
Discharge Plan Renewal Conditions Complete

Dear Sir:
Dynegy Midstream Services, Limited Partnership (DMS) has completed the underground lines pressure testing to demonstrate pipe integrity as in renewal condition 9 and sump inspections were done visually as condition 8 states. Approval conditions 14 A&B which cover the area around the wastewater disposal tanks was cleaned as per the cleanup plan submitted to your office December 27, 2000. All documentation including line diagrams and pressure tests is filed at the Vada facility.

All other conditions were met as described in our correspondence to you on December 27, 2000. Dynegy believes the conditions have been met and this memo should conclude the renewal process.

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

Sincerely,

Cal Wrangham
ES&H Advisor

Cc: Chris Williams/ OCD Hobbs District
Vada Discharge Plan Manual
Clark White/Dynegy
Tim Jordan/Dynegy

Price, Wayne

From: Price, Wayne

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

To: 'Cal.Wrangham@dynegy.com'

Subject: RE: Dynegy Discharge Plans

Approved!

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

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

To: WPrice@state.nm.us

Subject: Dynegy Discharge Plans

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

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

DYNEGY

January 17, 2001

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

RE: GW-026 and GW-027
Saunders and Vada Gas Plants
Discharge Plan Renewal Conditions

Dear Sir:

The Saunders and Vada facilities will begin underground piping mechanical integrity testing January 22, 2001. This memo is to inform your office of this as required by condition 9 in the Discharge Plan renewal conditions.

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

Sincerely,

Cal Wrangham
ES&H Advisor

Cc: Chris Williams/ OCD Hobbs
Saunders Discharge Plan Manual
Tim Jordan/Dynegy

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

DYNEGY

October 16, 2000

Mr. Roger Anderson
Environmental Bureau Chief
Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505

RE: GW-027
Vada Compressor Station
Discharge Plan Renewal

Dear Sir:
Please find attached a check ($690.00) for the discharge plan renewal flat fee and the signed approval conditions. I would like to thank you and your staff for the professional and courteous manner in which you have guided us through this process.

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

Sincerely,

Cal Wrangham
ES&H Advisor

Cc: Chris Williams/ OCD Hobbs

ATTACHMENT TO THE DISCHARGE PLAN GW-027 APPROVAL
Dynegy Midstream Services, L.P., Vada Gas Compressor Plant
DISCHARGE PLAN APPROVAL CONDITIONS
October 2, 2000

1. Payment of Discharge Plan Fees: The $50.00 filing fee has been received by the OCD. There is a required flat fee equal to one-half of the original flat fee for natural gas compressor plants. The renewal flat fee required for this facility is $690.00 which may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan, with the first payment due upon receipt of this approval. The filing fee is payable at the time of application and is due upon receipt of this approval.

2. Commitments: Dynegy Midstream Services, L.P. will abide by all commitments submitted in the discharge plan renewal letter dated February 03, 2000, and these conditions for approval.

3. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums should be stored on their sides with the bungs in place and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets must also be stored on an impermeable pad with curbing.

4. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.

5. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new facilities or modifications to existing facilities must place the tank on an impermeable type pad within the berm.

6. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

7. Labeling: All tanks, drums, and other containers should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill, or ignite.

8. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must be tested to demonstrate their mechanical integrity no later than December 15, 2000 and every year from tested date, thereafter. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing. The test results will be submitted to OCD by December 31, 2000.

9. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity no later than December 15, 2000 and every 5 years, from tested date, thereafter. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing. The test results will be submitted to OCD by December 31, 2000.

10. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be approved for construction and/or operation unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

11. Housekeeping: All systems designed for spill collection/prevention, and leak detection will be inspected daily to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices will be emptied of fluids within 48 hours of discovery.

12. Spill Reporting: All spills/releases shall be reported pursuant to OCD Rule 116. and WQCC 1203. to the OCD Hobbs District Office.

13. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.

14. OCD Inspections: Additional requirements may be placed on the facility based upon results from OCD inspections. As a result of the inspection conducted by OCD on May 10, 2000 (copy enclosed) the following action items shall be addressed:

    A. Provide to OCD for approval a clean-up plan for the area located around the Waste Water Disposal Tanks (see photo #5).
    B. Provide to OCD a plan to install proper containment for the Plant Waste Water Storage Tanks (see photo # 5).
    C. Provide the most recent water analysis for the on-site plant water well.

    Please provide the above requested plans and information by December 31, 2000.

15. Storm Water Plan: Dynegy Midstream Services, L.P. will submit a stormwater run-off plan for OCD by December 31, 2000.

16. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.

17. Closure: The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

18. Certification: **Dynegy Midstream Services, L.P.** by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. **Dynegy Midstream Services, L.P.** further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Conditions accepted by: **Dynegy Midstream Services, L.P.**

Clark White
Company Representative- print name

Clark White Date 10/16/00
Company Representative- Sign

Title Region Manager

Affidavit of Publication

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

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

That the notice which is hereto attached, entitled

Notice of Publication GW-25, GW-26, & GW-27

was published in a regular and entire issue of **THE LOVINGTON DAILY LEADER** and not in any supplement thereof, for One(1) Day, beginning with the issue of March 28, 2000 and ending with the issue of March 28, 2000.

And that the cost of publishing said notice is the sum of $ 83.60 which sum has been (Paid) as Court Costs.

Joyce Clemens

Subscribed and sworn to before me this
March 28, 2000.

Debbie Schilling

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

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan application have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131.

(GW-25) Dynegy Midstream Services, LP, Cal Wrangham, 6 Desta Drive, Suite 3300, Midland, Texas 79705, has submitted a renewal application for the previously approved discharge plan for their Monument Gas Processing Plant located in SW/4, Section 36, Township 19 South, Range 36 East, NW/4, Section 1, Township 20 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 42,000 gallons per day of wastewater is disposed of in an OCD approved Class II injection well. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 35 to 60 feet with a total dissolved solids concentration ranging from 500 to 3,000 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

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Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 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 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 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 Twenty-third (23rd) day of March, 2000.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
LORI WROTENBERY, Director

SEAL

Published in the Lovington Daily Leader March 28, 2000.

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

MAR 30 2000
OIL CONSERVATION DIVISION

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

AD NUMBER: 139925 ACCOUNT: 56689
LEGAL NO: 67118 P.O.#: 00199000278
280 LINES 1 time(s) at $ 123.43
AFFIDAVITS: 5.25
TAX: 8.04
TOTAL: 136.72

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, B Peiner being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication #67118 a copy of which is hereto attached was published in said newspaper 1 day(s) between 03/29/2000 and 03/29/2000 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 29 day of March, 2000 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/ Betsy Peiner
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 28 day of March A.D., 2000.

Notary Candace R. Dunton

Commission Expires 11/16/2003

Wayne Price
Approved

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 application has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-25) Dynegy Midstream Services, LP, Cal Wrangham, 6 Desta Drive, Suite 3300, Midland, Texas 79705, has submitted a renewal application for the previously approved discharge plan for their Monument Gas Processing Plant located in SW/4, Section 36, Township 19 South, Range 36 East, NW/4, Section 1, Township 20 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 42,000 gallons per day of wastewater is disposed of in an OCD approved Class II injection well. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 35 to 60 feet with a total dissolved solids concentration ranging from 500 to 3,000 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

(GW-26) Dynegy Midstream Services, LP, Cal Wrangham, 6 Desta Drive, Suite 3300, Midland, Texas 79705, has submitted a renewal application for the previously approved discharge plan for their Saunders Gas Processing Plant located Section 34, Township 14 South, Range 33 East, NMPM, Lea County, New Mexico. Approximately 18,900 gallons per day of process wastewater is disposed of in an OCD approved Class II injection well. The wastewater has a total dissolved solids concentration of approximately 3881 mg/l. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 100 feet with a total dissolved solids concentration of approximately 600 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

(GW-27) Dynegy Midstream Services, LP, Cal Wrangham, 6 Desta Drive, Suite 3300, Midland, Texas 79705, has submitted a renewal application for the previously approved discharge plan for their Vada Compressor Station located in Section 23, Township 10 South, Range 33 East, NMPM, Lea County, New Mexico. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 35 feet with a total dissolved solids concentration of approximately 1000 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and a public hearing may be requested by any interested person. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this ***Twenty-third (23rd) day of March, 2000.***

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

for LORI WROTENBERY, Director

SEAL

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

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

or cash received on _____ in the amount of $ 690.00

from DYNEGY MIDSTREAM SERVICES

for VADA COMPRESSOR ST. GW-027.

Submitted by: (Family Name) WAYNE PRICE Date: (DP No.) 10/20/00

Submitted to ASD by: [signature] Date: 10/20/00

Received in ASD by: _____ Date: _____

Filing Fee ___ New Facility ___ Renewal ✓

Modification ___ Other _____ (specify)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment ✓ or Annual Increment ___

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

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

BANK ONE, NA
CHICAGO, IL 60670

62-28
311
0973777

PAY Six Hundred Ninety and NO/100 Dollars

CHECK NO.	CHECK DATE	PAY EXACTLY
[redacted]	10 / 12 / 00	$*********690.00

Void After 90 Days

TO THE ORDER OF

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

DYNEGY MIDSTREAM SERVICES,

[signature]

VICE PRESIDENT - TREASURER
AUTHORIZED SIGNATURE

[redacted]

OCD ENVIRONMENTAL BUREAU

SITE INSPECTION SHEET

DATE: 5/10/00 Time: 3:55 PM

Type of Facility: Refinery ☐ Gas Plant ☐ Compressor St. ☑ Brine St. ☐ Oilfield Service Co. ☐
Surface Waste Mgt. Facility ☐ E&P Site ☐ Crude Oil Pump Station ☐
Other ☐_____

Discharge Plan: No ☐ Yes ☑ DP# GW-027

FACILITY NAME: DYNEGY VADA PLANT

PHYSICAL LOCATION: _____

Legal: QTR___QTR____ Sec 23 TS 10S R 33E County LEA

OWNER/OPERATOR (NAME) DYNEGY MIDSTREAM SER.

Contact Person: CAL WRAWGHAM Tele:# 915-688-0591

MAILING
ADDRESS: 6 DESTA DR. SUITE 3300 State TX ZIP 79705

Owner/Operator Rep's: CAL WRAWGHAM KEIER LAWLIS

OCD INSPECTORS: W PRICE

1. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums will be stored on their sides with the bungs in and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets will also be stored on an impermeable pad and curb type containment.

OK-

2. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.

OK-

3. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.

OK-

4. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

OK-

5. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

OK

6. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing.

NEED TO INSPECT MAIN ENGINE ROOM SUMP -

7. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years thereafter, or prior to discharge plan renewal. The permittee may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.

NEED TO RUN MIT ON LINES

8. Onsite/Offsite Waste Disposal and Storage Practices: Are all wastes properly characterized and disposed of correctly? Does the facility have an EPA hazardous waste number? _____ Yes ___✓___ No

ARE ALL WASTE CHARACTERIZED AND DISPOSED OF PROPERLY? YES ☑ NO ☐ IF NO DETAIL BELOW.

WASTE WATER TRUCKED off site.

9. Class V Wells: Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. All Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Closure of Class V wells must be in accordance with a plan approved by the Division's Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, the environment and groundwater as defined by the WQCC, and are cost effective. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

ANY CLASS V WELLS NO ☑ YES ☐ IF YES DESCRIBE BELOW ! Undetermined ☐

10. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.

GOOD TO EXCELLANT

11. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the proper OCD District Office.

NO COMPLAINANCE ISSUES

12. Does the facility have any other potential environmental concerns/issues?

NONE NOTED

13. Does the facility have any other environmental permits - i.e. SPCC, Stormwater Plan, etc.?

SPCC - YES STORMWATER - NO

14. ANY WATER WELLS ON SITE ? NO ☐ YES ☑ IF YES, HOW IS IT BEING USED ?

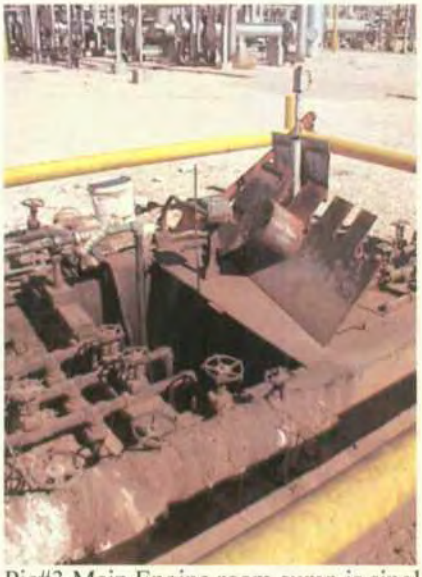
ONE WATER ON SITE - LOCATED SE PART of PLANT

Miscellaneous Comments:

Number of Photos taken at this site: 7

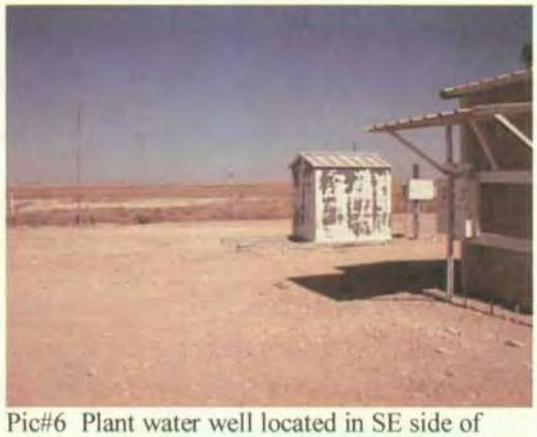
Pic#1 Entrance Sign


Pic#2 Generator room sump has secondary containment.


Pic#3 Main Engine room sump is single wall.


Pic#4 Glycol sump has secondary containment.


Pic#5 Plant Waste water disposal tanks.


Pic#6 Plant water well located in SE side of plant.

Pic#7 Looking NW from SE side of plant.

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

DYNEGY

February 15, 2000

Wayne Price
Environmental Engineer
Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505

Discharge Plan GW-027 Renewal
Vada Compressor Station

Gentlemen:

Dynegy Midstream Services, L. P. would like to renew the Vada Station Discharge Plan as required by WQCC Sec. 3106. The former Vada Plant processing has been shutdown and Vada is now a compressor station feeding the Saunders Plant. There is still in excess of 3000 HP of compressor there.

Please find the attached:
1) The renewal form and a check in the amount of $50.00, which constitutes our filing fee for the Discharge Plan renewal.
2) The updated Vada Station Waste Management Plan which replaces the WMP in the current approved Discharge Plan, Section IX.
3) The updated Spill Prevention Control and Countermeasure Plan which replaces the SPCC Plan in the current, approved Discharge Plan, Section VIII.

Please call me with any questions, Office (915) 688-0542 Cellular (915) 425-7072.

Sincerely,

Cal Wrangham

Cal Wrangham
Permian Basin Region ES&H Advisor

Cc: w/o attachments OCD Hobbs District Office

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 South First, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
2040 South Pacheco, Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resou
Oil Conservation Division
2040 South Pacheco
Santa Fe, NM 87505

Revised March 17, 1999

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

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

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

☐ New ☒ Renewal ☐ Modification

1. Type: Vada Compressor Station

2. Operator: Dynegy Midstream Services, L. P.

   Address: PO Box 1689 Lovington, NM (15 miles West of Tatum on Hwy 380, turn North on 9 Mile Ranch Road, turn right where pavement ends on 9 Ranch Road and go 3.3 miles to Vada)

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

3. Location: NW /4 /4 Section 23 Township 10 South Range 33 East
   Submit large scale topographic map showing exact location.

4. Attach the name, telephone number and address of the landowner of the facility site. **See on file at OCD**

5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility. **See on file at OCD**

6. Attach a description of all materials stored or used at the facility. **See on file at OCD**

7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included. **See attached updated Waste Management Plan (this replaces Section IX in current plan)**

8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures. **See attached updated Waste Management Plan (this replaces Section IX in current plan)**

9. Attach a description of proposed modifications to existing collection/treatment/disposal systems. **See attached updated Waste Management Plan (this replaces Section IX in current plan)**

RECEIVED
FEB 24 2000
Environmental Bureau
Oil Conservation Division

10. Attach a routine inspection and maintenance plan to ensure permit compliance. **See on file at OCD**

11. Attach a contingency plan for reporting and clean-up of spills or releases. **See attached updated SPCC Plan (this Replaces Section VIII in current Plan.**

12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included. **See on file at OCD**

13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders. **See on file at OCD**

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

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

Signature: Cal Wrangham Date: 2/3/2000

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 South First, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
2040 South Pacheco, Santa Fe, NM 87505

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

Revised March 17, 1999

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

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FEB 24 2000
Environmental Bureau
Oil Conservation Division

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

Signature: Cal Wrangham Date: 2/3/2000

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 application has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-25) Dynegy Midstream Services, LP, Cal Wrangham, 6 Desta Drive, Suite 3300, Midland, Texas 79705, has submitted a renewal application for the previously approved discharge plan for their Monument Gas Processing Plant located in SW/4, Section 36, Township 19 South, Range 36 East, NW/4, Section 1, Township 20 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 42,000 gallons per day of wastewater is disposed of in an OCD approved Class II injection well. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 35 to 60 feet with a total dissolved solids concentration ranging from 500 to 3,000 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

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Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and a public hearing may be requested by any interested person. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this ***Twenty-third (23rd) day of March, 2000.***

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

for LORI WROTENBERY, Director

SEAL

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 2/18/00,

or cash received on ______________ in the amount of $ 50.00

from VERSADO GAS PROCESSORS, L.L.C.

for VADA COMPRESSOR St. GW-027
(Facility Name) (DP No.)

Submitted by: WAYNE PRICE Date: 2/28/00

Submitted to ASD by: [signature] Date: 2/28/00

Received in ASD by: ______________ Date: ______________

Filing Fee ✓ New Facility ____ Renewal ____

Modification ____ Other ______________
(specify)

Organization Code 521.07 Applicable FY 2000

To be deposited in the Water Quality Management Fund.

Full Payment ____ or Annual Increment ____

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

VERSADO GAS PROCESSORS, L.L.C.
1000 LOUISIANA, SUITE 5800
HOUSTON, TEXAS 77002-5050
(877) 672-1449

BANK ONE, NA
CHICAGO, IL 60670

PAY Fifty and NO/100 Dollars

CHECK NO.	CHECK DATE	PAY EXACTLY
[redacted]	02 / 18 / 00	$*********50.00

Void After 90 Days

TO THE ORDER OF
State of New Mexico
Energy, Minerals and Natural Resources Oil Conservation Div
2040 S Pacheco
Santa Fe NM 87505

VERSADO GAS PROCESSORS, L.L.C.

[signature]
VICE PRESIDENT - TREASURER
AUTHORIZED SIGNATURE

[redacted]

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

Jennifer A. Salisbury
CABINET SECRETARY

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

Memorandum of Meeting or Conversation

Telephone __X___
Personal _____
E-Mail ___X____

Time: 9:15 am
Date: January 7, 2000

Originating Party: Wayne Price-OCD

Other Parties: **Cal Wrangham -Dynegy Midstream Services,LP**
915-688-0542, fax 915-688-0552, E-Mail klee.dynegy.com

Subject:	**Discharge Plan Renewal Notice for the following Facilities:**		
GW-018	**Bluitt**	**expires**	**7/31/2000**
GW-025	**Monument**	**expires**	**7/31/2000**
GW-026	**Saunders**	**expires**	**7/31/2000**
GW-027	**Vada**	**expires**	**7/31/2000**

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

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

Conclusions or Agreements:
Signed: _____

CC: E-Mail Dynegy

Price, Wayne

From: KLEE@dynegy.com[SMTP:KLEE@dynegy.com]
Sent: Friday, January 07, 2000 11:36 AM
Subject: RE: Discharge Plan Renewal Notice

Return Receipt

Your document: RE: Discharge Plan Renewal Notice

was received by: Johnnie Leeson/NGCCorp

at: 12:36:53 PM Today

WARREN PETROLEUM
COMPANY, L.P.

An NGC Company

13430 Northwest Freeway
Suite 1200
Houston, TX 77040-6095

September 20, 1996

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Attn.: Mr. Roger C. Anderson
Environmental Bureau Chief

**Re: TRANSFER OF DISCHARGE PLANS,
SWD ADMINISTRATIVE ORDERS, and
ANNUAL LPG STORAGE WELL REPORTS
WARREN PETROLEUM COMPANY**

Dear Ladies and Gentlemen:

This is to confirm that the merger between Chevron USA Inc.'s Warren Petroleum Company Division and NGC Corporation was completed on August 31, 1996. Effective September 1, 1996, Warren Petroleum Company, Limited Partnership, will be responsible for compliance with the discharge plans, SWD administrative orders and annual storage well reports referenced in the attached letter.

If you have any questions, please call J. Dee Morris at 713-507-6752.

Very truly yours,

H. Schuster

Hans Schuster
Vice President - Technical Services

Attachment
xc: Mr. Jerry Sexton
NMOCD District 1
PO Box 1980
Hobbs, NM 88241-1980

Mr. Bob Boyd
New Mexico

PT27doc

Chevron **Warren**

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

R. L. Langley
Manager, Health, Environment
and Loss Prevention
Phone 918 560 4471
Fax 918 560 4544

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

August 27, 1996

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

Attn.: Mr. Roger C. Anderson
Environmental Bureau Chief

**Re: TRANSFER OF DISCHARGE PLANS,
SWD ADMINISTRATIVE ORDERS, and
ANNUAL LPG STORAGE WELL REPORTS
WARREN PETROLEUM COMPANY**

Dear Ladies and Gentlemen:

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

Warren Petroleum Company, a Division of Chevron USA Inc., and NGC Corporation agree that on the merger closing, the responsibility for compliance with the Discharge Plans, the SWD Administrative Orders, and the filing of the Annual Storage Well Reports listed on the Attachment will shift from Warren Petroleum Company, a Division of Chevron USA Inc., to Warren LP. Warren LP will be liable for compliance effective the merger close date forward.

New Mexico Oil Conservation Division
Attn.: Mr. Roger C. Anderson
August 27, 1996

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

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

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

Very truly yours,

R. L. Langley

Attachment

xc: Mr. Jerry Sexton
NMOCD District 1
PO Box 1980
Hobbs, NM 88241-1980

Mr. Bob Boyd
New Mexico

New Mexico Oil Conservation Division
Attn.: Mr. Roger C. Anderson
August 27, 1996

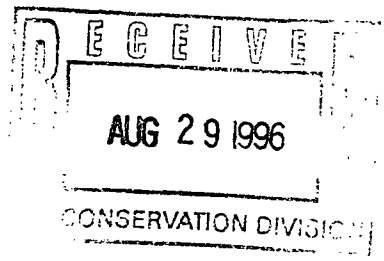
ATTACHMENT

Warren Petroleum Company
a division of Chevron USA Inc.

Discharge Plans, Annual Storage Well Reports and SWD Administrative Orders

BLUITT PLANT	NMOCD Discharge Plan GW-18 (7/5/95)
EUNICE PLANT	NMOCD Discharge Plan GW-05 (5/96)
MONUMENT PLANT	NMOCD - Discharge Plan GW-25 (7/5/95)
MONUMENT PLANT	NMOCD Administrative Order SWD-561 (6/16/94)
MONUMENT PLANT	NMOCD Annual Report for Propane Storage Well #1
MONUMENT PLANT	NMOCD Annual Report for LPG Storage Well #2
SAUNDERS PLANT	NMOCD Discharge Plan GW-26 (7/5/95)
SAUNDERS PLANT	NMOCD Administrative Order SWD-255 (7/13/93)
VADA PLANT	NMOCD Discharge Plan GW-27 (7/5/95)

Warren



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

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

August 23, 1996

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

Attn.: Mr. Jon D. Klaff

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

Dear Ladies and Gentlemen:

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

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

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

Very truly yours,

For

D. D. Dunlap

Attachment
cc without forms:

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

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

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

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

Warren

Tulsa, OK
August 2, 1995

MEMO TO FILE
LETTER OF AUTHORIZATION

To Whom It May Concern:

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

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

D. D. Dunlap, Vice President
Operations

DDD/LLJ/lj

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

s:\envr\llj\aauthltr.doc

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

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

ABILENE LPG TRANSPORT, TX USEPA - Stormwater General Permit Notification (NOI) TXR00F771 (9/16/94)*(NOT attached)(NOI attached)(1)
BLUITT PLANT, NM USEPA - Stormwater General Permit Notification (NOI) NMR10A117 (8/13/93)*(NOT filed 12/7/95)(2)
BRIDGEPORT LPG TRANSPORT, TX USEPA - Stormwater General Permit Notification (NOI) TXR00F773 (9/16/94)*(NOT attached)(NOI attached)(3)
CANADIAN PLANT, TX USEPA - Stormwater General Permit Notification (NOI) TXR00C292 (12/31/92) (plant)*(NOT attached)(NOI attached)(4)
CANADIAN PLANT, TX USEPA - Stormwater General Permit Notification (NOI) TXR00D737 (12/31/92) (Pipeline)*(NOT filed 4/7/95)(5)
CANADIAN PLANT, TX USEPA - Stormwater General Permit Notification (NOI) TXR00D738 (12/31/92) (Pipeline)*(NOT filed 4/7/95)(6)
CANADIAN PLANT, TX USEPA - Stormwater General Permit Notification (NOI) TXR10G035 (5/9/94) (Pipeline)*(NOT filed 4/7/95)(7)
CANADIAN PLANT, TX USEPA - Stormwater General Permit Notification (NOI) TXR10G036 (5/9/94) (Pipeline)*(NOT filed 4/7/95)(8)
CANADIAN PLANT, TX USEPA - Stormwater General Permit Notification (NOI) TXR10H339 (11/18/93) (Pipeline)*(NOT filed 4/7/95)(9)
CANADIAN PLANT, TX USEPA-NPDES App. No. TX0113204 (02/24/95)
CANADIAN PLANT, TX USEPA-Stormwater General Permit Notification TXR00G271-ElPaso/No. Natural (PIPELINE) (04/07/95)*(NOT filed 7/19/95)(10)
CANADIAN PLANT, TX USEPA-Stormwater General Permit Notification TXR10P104: Red Deer (PIPELINE) (06/06/95)*(NOT attached)(11)
CANADIAN PLANT, TX USEPA-Stormwater General Permit Notification-TXR10M897-Cree Flowers (PIPELINE) (01/17/95)*(NOT filed 7/19/95)(12)
EUNICE PLANT, NM USEPA - Stormwater General Permit Notification (NOI) NMR00A189 (12/31/92)*(NOT filed 3/10/93)(13)
EUNICE PLANT, NM USEPA - Stormwater General Permit Notification NMR10A408, (PIPELINE) Const. (06/06/95)*(NOT attached)(14)
FASHING PLANT, TX USEPA - National Pollutant Discharge Elimination System (NPDES) Permit TX0086720 (5/19/82)
FASHING PLANT, TX USEPA Renewed NPDES Permit (8/18/87) permit # TX0086720
GLADEWATER LPG TRANSPORT, TX USEPA - NPDES No. TX0112712 Administratively Complete Application (8/29/94)
GLADEWATER LPG TRANSPORT, TX USEPA - Stormwater General Permit Notification (NOI) TXR00F774 (9/16/94)*(NOT attached)(NOI attached)(15)
MONAHANS PLANT, TX USEPA - Stormwater General Discharge Permit No. TXR00F913, SW Royalties NXS (PIPELINE) (11/30/94)*(NOT attached)(16)
MONAHANS PLANT, TX USEPA - Stormwater General Discharge Permit Notice No.TXR10N685, Tiger #1 (PIPELINE)(02/15/95)*(NOT attached)(17)
MONAHANS PLANT, TX USEPA - Stormwater General Discharge Permit Notice, No.TXR10M935, Sand Hills to Monahans (PIPELINE) (01/17/95)*(NOT attached)(18)

MONAHANS PLANT, TX USEPA - Stormwater General Discharge Permit Notice, No.TXR10P710 (7/7/95)(NOT attached)(39)
MONT BELVIEU PLANT, TX USEPA - NPDES Application No. TX0002887 deemed complete (9/23/88) and (5/3/96)
MONT BELVIEU PLANT, TX USEPA TX0111414 Discharge Permit Application Complete (6/14/93)
MONT BELVIEU PLANT, TX USEPA - National Pollutant Discharge Elimination System (NPDES) Permit TX0002887 (5/15/75)
MONT BELVIEU PLANT, TX USEPA Stormwater General Permit Notification TXR00C294(12/31/92)*(NOT attached)(19)
MONT BELVIEU TERMINAL, TX USEPA - Stormwater General Permit Notification (NOI) TXR00E567 (12/31/92)*(NOT attached)(NOI attached)(20)
MONT BELVIEU TERMINAL, TX USEPA NPDES- TXG340278 (received 9/28/88)
MONUMENT PLANT, NM USEPA - Stormwater General Permit Notification No. NMR10A327, Joy Compressor Station (PIPELINE) (01/17/95)*(NOT filed 9/26/95)(21)
NO. SHERMAN PLANT, TX USEPA - Stormwater General Permit Notification (NOI) TXR00C289 (12/31/92)*(NOT attached)(NOI attached)(22)
SAND HILLS PLANT, TX USEPA - NPDES - NOI approved (Stormwater) Wolfcamp (PIPELINE) (3/30/93) Permit TXR10D572*(NOT filed 4/13/95)(23)
SAND HILLS PLANT, TX USEPA - Stormwater General Permit Notification No. TXR10Q150, Meridian (PIPELINE) 1995 Upgrade (08/09/95)*(NOT attached)(24)
SAND HILLS PLANT, TX USEPA - Stormwater General Permit Notification No.TXR10M664, King Mt. Comp. Sta. (PIPELINE) (11/30/94)*(NOT filed 4/13/95)(25)
SAND HILLS PLANT, TX USEPA-Stormwater General Permit Notification No. TXR10S520, Wolfcamp (PIPELINE) (4/5/96)*(NOT filed 4/5/96)(26)
SAND HILLS PLANT, TX USEPA-Stormwater General Permit Notification No. TXR10S521, Gomez (PIPELINE) (4/5/96)*(NOT filed 4/5/96)(27)
SAND HILLS PLANT, TX USEPA-Stormwater General Permit Notification No. TXR10T722, Crawar (PIPELINE) (4/5/96)*(NOT filed 4/5/96)(28)
SAND HILLS PLANT, TX USEPA-Stormwater General Permit Notification No. TXR10U246, CG-25 Suction (PIPELINE) (5/21/96)*(NOT attached)(29)
SAND HILLS PLANT, TX USEPA-Stormwater General Permit Notification No. TXR10V341, Grayburg 6" Upgrade (7/19/96)(NOT attached)(40)
SAUNDERS PLANT, NM USEPA - Stormwater General Permit Notification (NOI) NMR10A084 (5/21/93)*(NOT filed 4/7/95)(30)
SHERMAN PLANT, TX USEPA - Stormwater General Permit Notification, No. TXR10N440, Beulah Hazlip (PIPELINE) tie-in (01/17/95)*(NOT attached)(31)
SHERMAN PLANT, TX USEPA - Stormwater General Permit Notification, No. TXR10N441,J. H. Lawrence Upgrade (01/17/95)*(NOT attached)(32)
SHERMAN PLANT, TX USEPA - Stormwater General Permit Notification, No. TXR10N442, Shell-Hagerman (PIPELINE) (01/17/95)*(NOT filed 6/3/95)(33)
SHERMAN PLANT, TX USEPA - Stormwater General Permit Notification, No. TXR10N443, M/b N Low Pressure (PIPELINE) (01/17/95)*(NOT attached)(34)
MONAHANS PLANT, TX USEPA - Stormwater General Permit Notification, No. TXR10P103, Chevron Estes Gas (PIPELINE) (06/06/95)*(NOT attached)(35)
SHERMAN PLANT, TX USEPA - Stormwater General Permit Notification, No. TXR10T942, Chevron-Cullar (PIPELINE) (5/21/96)*(NOT attached)(36)
SO. SHERMAN PLANT, TX USEPA - Stormwater General Permit Notification (NOI) TXR00C290 (12/31/92)*(NOT filed 4/7/95)(37))

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

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

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

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

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

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

Chevron **Warren**

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

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

August 22, 1996

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

Attn.: Mr. Fred Woods
Enforcement Division

Re: TRANSFER OF EPA GENERATOR NUMBERS
WARREN PETROLEUM COMPANY

Dear Ladies and Gentlemen:

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

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

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

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

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

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

Very truly yours,

D. D. Dunlap

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

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

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

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

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

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

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

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

NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan renewal applications have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-018) - Warren Petroleum Company, Ken Stinson, P.O. Box 67, Monument, New Mexico 88265, has submitted a discharge plan renewal application for their Bluitt Gas Processing Plant located in the NE/4, Section 15, Township 8 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 19,500 gallons per day of process waste water is disposed of in an OCD approved Class II injection well. The waste water has a total dissolved solids concentration of approximately 5200 mg/l. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 100 feet with a total dissolved solids concentration of approximately 1400 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharge

(GW-026) - Warren Petroleum Company, Ken Stinson, P.O. Box 67, Monument, New Mexico 88265, has submitted a discharge plan renewal application for their Saunders Gas Processing Plant located Section 34, Township 14 South, Range 33 East, NMPM, Lea County, New Mexico. Approximately 18,9000 gallons per day of process waste water is disposed of in an OCD approved Class II injection well. The waste water has a total dissolved solids concentration of approximately 3881 mg/l. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 100 feet with a total dissolved solids concentration of approximately 600 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-027) - Warren Petroleum Company, Ken Stinson, P.O. Box 67, Monument, New Mexico 88265, has submitted a discharge plan renewal application for their Vada Gas Processing Plant located Section 23, Township 10 South, Range 33 East, NMPM, Lea County, New Mexico. Approximately 1,380 gallons per day of process waste water is disposed of in an OCD approved Class II injection well. The waste water has a total dissolved solids concentration of approximately 14,890 mg/l. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 35 feet with a total dissolved solids concentration of approximately 1000 mg/l. The discharge plan addresses how spills, leaks, and other accidental

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

[illegible]

STATE OF NEW MEXICO
County of Bernalillo SS

Bill Tafoya 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 of assessed as court cost; 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 of the 12 day of May, 1995, and the subsequent consecutive publications on ________, 1995

Bill Tafoya

Sworn and subscribed to before me, a notary Public in and for the County of Bernalillo and State of New Mexico, this 12 day of, May 1995

OFFICIAL SEAL
Megan Garcia
NOTARY PUBLIC
STATE OF NEW MEXICO
My Commission Expires 5-20-98

Megan Garcia

PRICE 127.47

Statement to come at end of month.

CLA-22-A (R-1/93) ACCOUNT NUMBER 580238

OK MA

Affidavit of Publication

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

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

RECEIVED
MAY 31 1995
Oil Conservation Division

That the notice which is hereto attached, entitled Notice Of Publication

.....

.....

was published in a regular and entire issue of THE LOVINGTON DAILY LEADER and not in any supplement thereof, one each week on the same day of the week, for one (1) day beginning with the issue of May 9, 19 95 and ending with the issue of May 9, 19 95

And that the cost of publishing said notice is the sum of $ 75.60 which sum has been (Paid) (Assessed) as Court Costs

Joyce Clemens

Subscribed and sworn to before me this 22nd day of May, 19 95

Jean Jenier
Notary Public, Lea County, New Mexico

My Commission Expires Sept. 28, 19 98

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

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan renewal applications have been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505)827-7131:

(GW-018)-Warren Petroleum Company, Ken Stinson, P.O. Box 67, Monument, New Mexico 88265, has submitted a discharge plan renewal application for their Bluitt Gaa Processing Plant located in the NE/4, Section 15, Township 8 South, Range 36 East, NMPM, Lea County, New Mexico. Approximately 19,500 gallons per day of process waste water is disposed of in an OCD approved Class II injection well. The waste water has a total dissolved solids concentration of approximately 5200 mg/l. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 100 feet with a total dissolved solids concentration of approximately 1400 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharge

(GW-026)-Warren Petroleum Company, Ken Stinson, P.O. Box 67, Monument, New Mexico 88265, has submitted a discharge plan renewal application for their Saunders Gas Processing Plant located Section 34, Township 14 South, Range 33 East, NMPM, Lea County, New Mexico. Approximately 18,900 gallons per day of process waste water is disposed of in an OCD approved Class II injection well. The waste water has a total dissolved solids concentration of approximately 3881 mg/l. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 100 feet with a total dissolved solids concentration of approximately 600 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-027)-Warren Petroleum Company, Ken Stinson, P.O. Box 67, Monument, New Mexico 88265, has submitted a discharge plan renewal application for their Vada Gas Processing Plant located Section 23, Township 10 South, Range 33 East, NMPM, Lea County, New Mexico. Approximately 1,380 gallons per day of process waste water is disposed of in an OCD approved Class II injection well. The waste water has a total dissolved solids concentration of approximately 14,890 mg/l. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 35 feet with a total dissolved solids concentration of approximately 1000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-031) - U.S. Department of Energy, Fenton Hill Geothermal Facility, Larry Kirkman, Acting Area Manager, Albuquerque Operations, Los Alamos Area Office, Los Alamos, New Mexico 87544, has submitted a discharge plan renewal application for their Fenton Hill Geothermal Facility located in the NE/4, Section 13, Township 19 North, Range 2 East, NMPM, Sandoval county, New Mexico. Water from a geothermal loop is discharged to a double-lined service pond equipped with leak detection during periods of emergency venting or during periods when maintenance operations on the geothermal loop require a discharge of water from the loop. The discharge to the pond will be temporsry as the water will be reinjected to the geothermal loop when normal operating conditions are attained. The water from the geothermal loop has a total dissolved solids concentration of approximately 3,200 mg/l. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 370 feet with a total dissolved solids concentration of approximately 240 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from

STATE OF NEW MEXICO

COUNTY OF LOS ALAMOS

IN THE _____ COURT

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO)

) ss.

COUNTY OF LOS ALAMOS)

NOTICE OF PUBLICATION

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

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Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan applications may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday thru Friday. Prior to ruling on any proposed discharge plan or its

OFFICIAL SEAL
MARGARET FULLMAN
NOTARY PUBLIC
STATE OF NEW MEXICO
My Commission Expires 1-13-96

THE LOS ALAMOS MONITOR
LOS ALAMOS, NEW MEXICO

Evelyn Vigil, being duly sworn, declares and says that she is the Editor of the Los Alamos Monitor, a newspaper published and having a general fully paid circulation and second-class postal privilege in the County of Los Alamos, State of New Mexico.

Affiant further states that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 14-11 N.M.S.A, 1978 Compilation and was so qualified at the time of all publications in reference hereto.

Affiant further states that the publication, a copy of which hereto affixed, was published in said paper, in the regular and entire issue of each number of the paper, during the period and time of publication and that the notice was published in the newspaper proper and not in a supplement, for One (1) consecutive weeks, the first publication being on the 9th day of May, 1995, and the subsequent consecutive publications on _____ and _____, 19___.

_____

Subscribed and sworn before me this 15th day of May, 1995.

Mary Margaret Fullman

Notary Public

My Commission Expires: November 13, 1996

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 2nd day of May, 1995.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

/s/William J. Lemay, Director
WILLIAM J. LEMAY, Director

SEAL

Publication Date: May 9, 1995.

subsequent consecutive publications on
_____ and [redacted], 19____.

[redacted]

Subscribed and sworn before me this 15th day of May, 1995.

Mary Margaret Fullman
Notary Public
My Commission Expires: November 13, 1996

Los Alamos Monitor
256 D.P. Rd
Los Alamos, NM 87544
(505) 662-4185

Energy, Min.&Nat. Resources
Sally E. Martinez
2040 S. Pacheco
Santa Fe, NM 87505

505-827-7131

CLASSIFIED ADVERTISING INVOICE

START DATE: 05/09/95
END DATE: 05/09/95
NUMBER OF INSERTIONS: 1
NUMBER OF WORDS: 273
AD CHARGE: 104.24
REMARK:

CLASSIFICATION: 101 LEGALS

FIRST LINE OF AD TEXT: NOTICE OF PUBLICATIO

TOTAL DUE: $ 104.24

TO PLACE A CLASSIFIED AD OR IF YOU HAVE A PROBLEM WITH THIS INVOICE PLEASE CONTACT MARY MARGARET FULLMAN (505) 662-5933. OFFICE HOURS ARE FROM 8:00 TO 5:30.

Chevron **Warren**

April 25, 1995

Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 S. Pacheco
Santa Fe, N.M. 87505

Re: Discharge Plan Renewal Application for Saunders, Vada & Bluitt Plants in Lea & Roosevelt Counties, New Mexico

Dear Mr. Ashley:

Please find enclosed a copy of the Bluitt Discharge Plan submitted for your approval. You can see that this plan is not in the same format as other Warren Petroleum Discharge Plans with which you are familiar. This is in an effort to remove some of the unnecessary material from the plan as I discussed with Roger Anderson and yourself in March. This plant is new to Warren Petroleum and previously was owned and operated by Trident Corporation. We have for the past one and one half years operated under their NMOCD approved plan. There should be nothing we have not discussed on your site visit in March in this plan. If I might provide any other information please let me know.

I have not included copies of Saunders (GW-26) and Vada (GW-27) because I knew that you already had copies of these plans and, as we discussed there will be no changes in these plans except for the removal of the Waste Management Section and referencing this to the Warren Petroleum General file in your office as we decided on my March visit to your office. However, please accept this as application for approval of these plans.

I am in the process of developing a letter to you addressing the requirements for approval of these plans as we discussed on your site visits. I am coordinating this with Wayne Price of your Hobbs office to ensure that I do not overlook anything. One item that we agreed to on an informal basis was testing of wastewater that is injected into Warren owned disposal wells. As I recall this was to be completed in May. This testing is underway and I will provide you with copies of the results as soon as they are available.

I enjoyed your visit and look forward to working with you on a frequent basis. As always, it is a pleasure, both personally and professionally to work with the NMOCD.

Sincerely,

Ken Stinson
Environmental Specialist

NOTICE OF PUBLICATION

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 2nd day of May, 1995.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

WILLIAM J. LEMAY, Director

State of New Mexico
ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT
Santa Fe, New Mexico 87505

New Mexico DRUG FREE It's a State of Mind!

January 11, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. Z-765-962-792

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

RE: Discharge Plan Renewal
Bluitt, Monument, Saunders, and Vada Gas Plants

Dear Mr. Stinson:

On June 15, 1994, Warren Petroleum Company received, via certified mail, notice from the New Mexico Oil Conservation Division (OCD) that the following discharge plans would expire on the noted dates. As of this date (January 11, 1995), the OCD has not received renewal applications from Warren Petroleum Company for the following plants.

- Bluitt Gas Plant, GW-018, located in Section 15, Township 8 South, Range 36 East, NMPM, Roosevelt County, New Mexico will expire on June 10, 1995.

- Monument Gas Plant, GW-025, located in Section 36, Township 19 South, Range 36 East, NMPM, Lea County, New Mexico will expire on July 31, 1995.

- Saunders Gas Plant, GW-026, located in Section 34, Township 14 South, Range 33 East, NMPM, Lea County, New Mexico will expire on July 31, 1995.

- Vada Gas Plant, GW-027, located in Section 23, Township 10 South, Range 33 East, NMPM, Lea County, New Mexico will expire on July 31, 1995.

If you wish to renew operations at these facilities, discharge plan applications shall be submitted and approved by the OCD prior to the noted expiration dates. The applications shall follow the Water Quality Control Commission Regulations and the OCD's Guidelines for the Preparation of Ground Water Discharge Plans at Natural Gas Processing Plants delivered to you with the OCD's June 15, 1994 renewal notice letter.

If there are any questions on this matter, please contact Mark Ashley at (505) 827-7155.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief

RCA/mwa
xc: OCD Hobbs Office

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

June 15, 1994

CERTIFIED MAIL
RETURN RECEIPT NO. P 111 334 316

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

RE: Discharge Plan Renewals
Bluitt, Monument, Saunders and Vada Gas Plants

Dear Mr. Stinson,

The following discharge plans were required and submitted to the Oil Conservation Division (OCD) pursuant to Water Quality Control Commission (WQCC) regulations and were approved for a period of five years. These approvals will expire on the noted dates.

- The discharge plan for the Bluitt Gas Plant, GW-018, located in Section 15, Township 8 South, Range 36 East, NMPM, Roosevelt County, New Mexico, will expire on June 10, 1995.

- The discharge plan for the Monument Gas Plant, GW-025, located in Section 36, Township 19 South, Range 36 East, NMPM, Lea County, New Mexico, will expire on July 31, 1995.

- The discharge plan for the Saunders Gas Plant, GW-026, located in Section 34, Township 14 South, Range 33 East, NMPM, Lea County, New Mexico, will expire on July 31, 1995.

- The discharge plan for the Vada Gas Plant, GW-027, located in Section 23, Township 10 South, Range 33 East, NMPM, Lea County, New Mexico, will expire on July 31, 1995.

If these facilities continue to have potential or actual effluent

or leachate discharges and you wish to continue operation, you must renew your discharge plans. 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 you system, and if so, please include these modifications in your applications for renewal.

Note that the completed and signed applications form must be submitted with your discharge plant renewal requests.

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 me at (505)827-5812.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief

RCA/rlm

xc: OCD Hobbs Office

STATE OF NEW MEXICO

OIL CONSERVATION DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone ☐ Personal	Time	Date
	9:00 Am	1/20/93

Originating Party	Other Parties
Ken Stinson - Warren Petroleum 1-393-2823	Kathy Brown

Subject

Warren Vadora Gas Plant
Spill & Disposal of Amine/Heating Oil

Discussion

Had a small spill with some heating oil & amine which reacted to form a brittle type of solid. It is less than a gallons worth of material. Want to put it in the landfarm at the plant. Based on knowledge of the process & composition of the 2 substances the OCD will allow this substance to go onto the landfarm.

Conclusions or Agreements

Distribution

Signed Kathy Brown

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS
GOVERNOR

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

October 29, 1990

CERTIFIED MAIL
RETURN RECEIPT NO. P-918-402-350

Ms. L. T. Reed, Senior Engineer
Warren Petroleum Company
P. O. Box 1589
Tulsa, Oklahoma 74102

RE: Discharge Plan GW-27
Vada Gas Processing Plant
Lea County, New Mexico

Dear Ms. Reed:

The ground water discharge plan renewal (GW-27) for the Warren Petroleum Company Vada Gas Processing Plant located in Section 23, Township 10 South, Range 33 East, NMPM, Lea County, New Mexico is hereby approved. The renewal application consists of the original discharge plan as approved July 31, 1985, the renewal application dated August 27, 1990, and materials dated October 2, 1990, submitted as supplements to the application.

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

Please be advised that all exposed pits, including lined pits and open top tanks (tanks exceeding 16 feet in diameter), shall be screened, netted, or otherwise rendered nonhazardous to wildlife including migratory birds.

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

Pursuant to Section 3-109.G.4., this plan approval is for a period of five (5) years. This approval will expire July 31, 1995 and you should submit an application for renewal in ample time before that date. It should be noted that all gas processing plants and oil refineries in excess of twenty-five years of age will be required to submit plans for, or the results of an underground drainage testing program as a requirement for discharge plan renewal.

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

Sincerely,

William J. LeMay
Director

WJL/RCA/sl

cc: OCD Hobbs Office

Chevron

Warren Petroleum Company CONSERVATION DIVISION
A Division of Chevron U.S.A. Inc.
P.O. Box 1689, Lovington, NM 88260

RECEIVED
'90 OCT 4 AM 9 01

Manufacturing Department

October 2, 1990

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

Attn: Roger C. Anderson
Environmental Engineer

Re: VADA GAS PROCESSING PLANT
LEA COUNTY, NEW MEXICO
DISCHARGE PLAN GW-27

Dear Mr. Anderson:

This letter will serve as notification that the items listed below were completed at the subject facility as of October 2, 1990.

- Solvent tank was curbed.
- Drains were plugged on drum storage.
- Scrubber oil dike capacity was inspected and found to exceed one-third more than the oil contents.
- A cement pad was placed under the transfer pumps and the truck transfer area.
- The sumps were inspected for leaks.
- The plant has no underground drain lines older than 25 years. (none were tested)

These items have been incorporated into the facility Discharge Plan. If you find that you have any questions, or need further information, please contact me at (505) 396-3221 or Linda Johnson at (918) 560-4138.

Sincerely,

J. R. Boyd
Plant Manager

JRB:REE:eb

cc: B. G. Schulz
L. L. Johnson

File: VII.B.3.d.(A)

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

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

for 1 times, the first publication being on the 29 day of Sept, 1990, and the subsequent consecutive publications on .....

.....

Sworn and subscribed to before me, a Notary Public in and for the County of Bernalillo and State of New Mexico, this 1 day of Oct, 1990.

PRICE $28.84

Statement to come at end of month.

ACCOUNT NUMBER C81184

OFFICIAL SEAL
Signature Bernadette Ortiz
BERNADETTE ORTIZ
NOTARY PUBLIC-NEW MEXICO
FILED WITH SECRETARY OF STATE
Commission Expires 12-18-93

EDJ-15-B (R-12/89)

STATE OF NEW MEXICO
ENERGY, MINERALS AND
NATURAL RESOURCES
DEPARTMENT

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-26) - Warren Petroleum Company, J.R. Boyd, Plant Manager, P.O. Box 1589, Tulsa, Oklahoma 74102, has submitted an application for renewal of its previously approved discharge plan for its Saunders Gas Processing Plant located at Section 34, Township 14 South, Range 33 East, NMPM, Lea County, New Mexico. Approximately 18900 gallons per day of process wastewater is disposed of in an OCD approved Class II injection well. The wastewater has a total dissolved solids concentration of approximately 3881 mg/l. Ground water most likely to be affected by any discharge to the surface is at a depth of approximately 100 feet with a total dissolved solids concentration of approximately 600 mg/l. The discharge plan addresses how spills, leaks and other discharges to the ground will be managed.

(GW-27) - Warren Petroleum Company, J.R. Boyd, Plant Manager, P.O. Box 1589, Tulsa, Oklahoma 74102, has submitted an application for renewal of its previously approved discharge plan for its Vada Gas Processing Plant located in Section 23, Township 10 South, Range 33 East, NMPM, Lea County, New Mexico. Approximately 1380 gallons per day of process wastewater is disposed of in an OCD approved Class II injection well. The wastewater has a total dissolved solids concentration of approximately 14,000 mg/l. Ground water most likely to be affected by any discharge to the surface is at a depth of approximately 35 feet with a total dissolved solids concentration of approximately 1000 mg/l. The discharge plan addresses how spills, leaks and other 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 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 24th day of September, 1990.

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

September 29, 1990

Chevron

Warren Petroleum Company
A Division of Chevron U.S.A. Inc.
P.O. Box 1589, Tulsa, OK 74102

Manufacturing Department

Tulsa, Oklahoma
August 27, 1990

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

Attention: Roger C. Anderson
Environmental Engineer

VADA GAS PROCESSING PLANT
LEA COUNTY, NEW MEXICO
DISCHARGE PLAN GW-27

Dear Mr. Anderson:

I have attached a copy of our Discharge Plan for the subject facility, which reflects current operations.

In addition to, and as a part of the plan, we will do the following:

- Curb solvent tank
- Plug drains on drum storage
- Check dike capacity for scrubber oil to be sure it contains one-third more than the oil contents.
- Put a cement pad under the transfer pumps, and also the truck transfer area.
- Annually check sumps for leaks
- Test all underground drain lines older than 25 years.

I will submit a progress report to you monthly until all of these projects are completed, and thereby become a part of the Discharge Plan. I expect that all items will be complete by August 1, 1991.

1639/08270/LLJ/L/VADA DISG PLN

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

Very truly yours,

J. R. Boyd
Plant Manager

JRB:fy
Attachment

xc: B. G. Schulz

1639/08270/LLJ/L/VADA DISG PLN

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS
GOVERNOR

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

January 5, 1990

CERTIFIED MAIL
RETURN RECEIPT NO. P-918-402-160

Ms. L. T. Reed
Senior Engineer
WARREN PETROLEUM COMPANY
P. O. Box 1589
Tulsa, Oklahoma 74102

RE: Discharge Plan GW-27
Vada Gas Processing Plant
Lea County, New Mexico

Dear Ms. Reed:

On July 31, 1985, the ground water discharge plan, GW-27 for the Vada Gas Processing Plant located in Section 23, Township 10 South, Range 33 East, NMPM, Lea County, New Mexico, was approved by the Director of the Oil Conservation Division (OCD). This discharge plan was required and submitted pursuant to Water Quality Control Commission (WQCC) regulations and was approved for a period of five years. The approval will expire on July 31, 1990.

If your facility continues to have effluent or leachate discharges and you wish to continue discharging, please submit your application for renewal of plan approval as quickly as possible. The OCD is reviewing discharge plan submittals and renewals carefully and the review time can often extend for several months. Please indicate whether you have made, or intend to make, any changes in your discharge system, and if so, include an application for plan amendment with your application for renewal. To assist you in preparation of your renewal application, I have enclosed a copy of the OCD's guidelines for preparation of ground water discharge plans at natural gas processing plants. These guidelines are presently being revised to include berming of tanks, curbing and paving of process areas susceptible to leaks or spills and the disposition of any solid wastes. Please include these items in your renewal application.

If you no longer have such discharges and discharge plan renewal is not needed, please notify this office.

Please note that all gas plants, refineries and compressor stations in excess of 25 years of age will be required to submit plans for, or the results of, an underground drainline testing program as a requirement for discharge plan renewal.

If you have any questions, please do not hesitate to contact Roger Anderson at (505) 827-5884.

Sincerely,

David G. Boyer, Hydrogeologist
Environmental Bureau Chief

DGB/sl

Enclosure

cc: OCD Hobbs Office

Chevron

Warren Petroleum Company
A Division of Chevron U.S.A. Inc.
P.O. Box 1589, Tulsa, OK 74102

Manufacturing Department

October 14, 1985

R. L. Stamets
State of New Mexico
Oil Conservation Division
Energy and Minerals Department
P.O. Box 2088
Santa Fe, New Mexico 87501

Attn: Philip Baca

RE: Discharge Plans for Monument (GW-25), Saunders (GW-26) and Vada (GW-27) Gas Processing Plants - Lea County, New Mexico

Dear Mr. Baca:

With regard to the subject discharge plans, the following information is submitted in accordance with your request of July 31, 1985.

The discharge plans were conditionally approved pending submittal of the requested information by October 18, 1985.

As such, attached please find a drawing for each of the subject plants showing the underground waste water pipelines. The approximate age, material, thickness and pipe diameter are indicated. Steel pipelines are connected by welding; polyethylene lines are joined by butt fusion; PVC pipe is installed using PVC contact cement.

The majority of the disposal of solid waste not governed by the Resource Conservation and Recovery Act (non-RCRA solid waste) at the Monument Plant is by a solid refuse collector, Waste Control of New Mexico. The remainder of the solid waste is disposed of at the plant site. It consists mostly of lumber, scrap metal, rock, debris, etc. All non-RCRA solid waste is removed from the Saunders and Vada Plants by Waste Control of New Mexico, Inc.

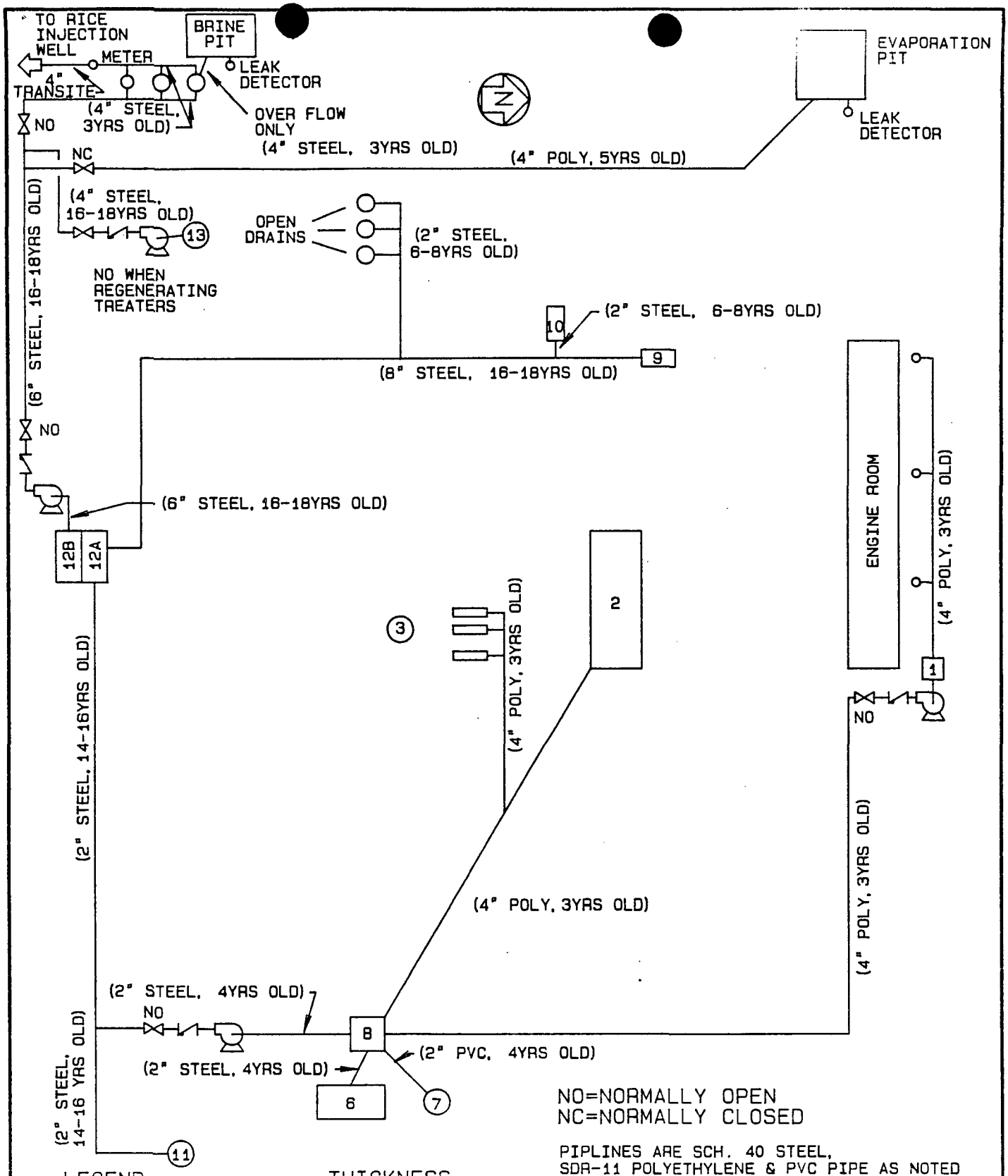
The information provided herein is in answer to your letter of July 31, 1985 as we have interpreted your questions. If you find that you need further information, please feel free to contact Linda Johnson or myself at (918) 560-4138.

Very truly yours,

Linda Johnson

for L. T. Reed, Director
Environmental Affairs

LLJ/cd



NO=NORMALLY OPEN
NC=NORMALLY CLOSED

PIPLINES ARE SCH. 40 STEEL,
SDR-11 POLYETHYLENE & PVC PIPE AS NOTED

LEGEND

1-NORTH ENGINE ROOM SUMP
2-COOLING TOWER
3-CONDENSORS
4-BOILER
5-BOILER
6-BOILER
7-H_2S SCRUBBER
8-EAST SUMP
9-SOUTH ENGINE ROOM SUMP
10-CONDENSORS
11-CONDENSATE TANK
12A-SKIMMER
12B-SOUTH SUMP
13-ZEOLITE H_2O TREATER

THICKNESS

STEEL 2"=0.154"
STEEL 4"=0.237"
STEEL 6"=0.280"
STEEL 8"=0.322"
POLY 4"=0.409"
PVC 2"=0.300"
TRANS. 4"=RICE LINE

NO. OF UNITS REQUIRED THUS	WO-AFE NO.

WARREN PETROLEUM COMPANY
A DIVISION OF GULF OIL CORPORATION

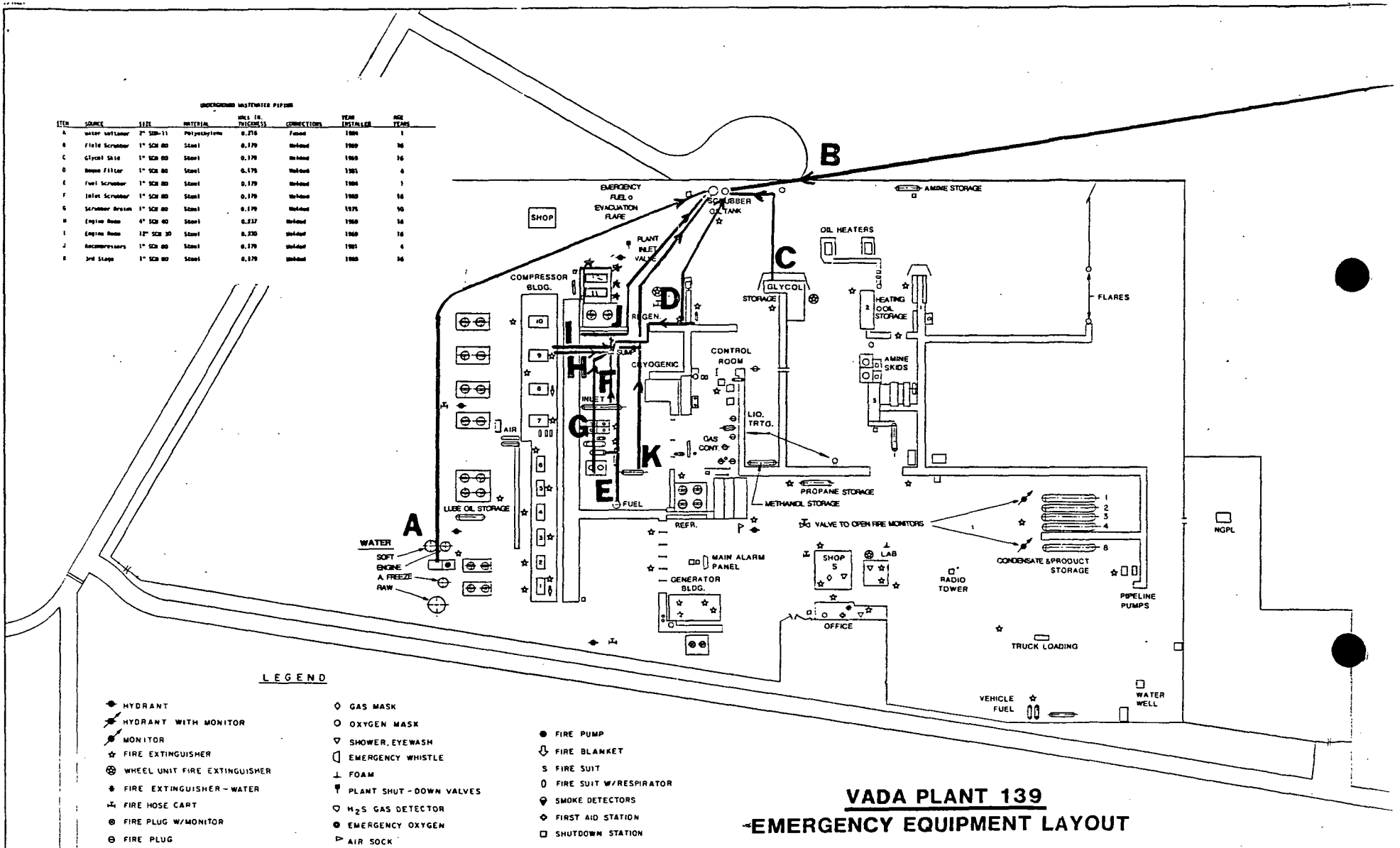
WASTE WATER SYSTEM LAYOUT

PLANT 118 MONUMENT LEA, COUNTY, NM.

DRAWN	HPK	DATE 10/11/85	SCALE NONE
CHECKED	LLJ	DATE 10/11/85	DRAWING NO.
APPR.	PDA	DATE 10/11/85	118-1001-0

UNDERGROUND WASTEWATER PIPING

ITEM	SOURCE	SIZE	MATERIAL	WALL TH. THICKNESS	CONNECTIONS	YEAR INSTALLED	AGE YEARS
A	Water Softener	2" SCH-11	Polyethylene	0.216	Fused	1986	1
B	Field Scrubber	1" SCH 80	Steel	0.179	Welded	1969	16
C	Glycol Skid	1" SCH 80	Steel	0.179	Welded	1969	16
D	Reuse Filter	1" SCH 80	Steel	0.179	Welded	1985	4
E	Fuel Scrubber	1" SCH 80	Steel	0.179	Welded	1986	1
F	Inlet Scrubber	1" SCH 80	Steel	0.179	Welded	1969	16
G	Scrubber Drains	1" SCH 80	Steel	0.179	Welded	1975	10
H	Engine Room	4" SCH 40	Steel	0.237	Welded	1969	16
I	Engine Room	12" SCH 30	Steel	0.330	Welded	1969	16
J	Recompressors	1" SCH 80	Steel	0.179	Welded	1985	4
K	3rd Stage	1" SCH 80	Steel	0.179	Welded	1969	16



LEGEND

- HYDRANT
- HYDRANT WITH MONITOR
- MONITOR
- FIRE EXTINGUISHER
- WHEEL UNIT FIRE EXTINGUISHER
- FIRE EXTINGUISHER - WATER
- FIRE HOSE CART
- FIRE PLUG W/MONITOR
- FIRE PLUG
- GAS MASK
- OXYGEN MASK
- SHOWER, EYEWASH
- EMERGENCY WHISTLE
- FOAM
- PLANT SHUT-DOWN VALVES
- H_2S GAS DETECTOR
- EMERGENCY OXYGEN
- AIR SOCK
- FIRE PUMP
- FIRE BLANKET
- S FIRE SUIT
- FIRE SUIT W/RESPIRATOR
- SMOKE DETECTORS
- FIRST AID STATION
- SHUTDOWN STATION

VADA PLANT 139
EMERGENCY EQUIPMENT LAYOUT

GENERAL NOTES	GENERAL NOTES	DWG. NO.	REFERENCE DRAWINGS

NO.	REVISION	BY	DATE	CHK.	APPR
1	Rev. per Plans info. (B.D.M.)	RTH	7-9-85		

NO.	REVISION	BY	DATE	CHK.	APPR

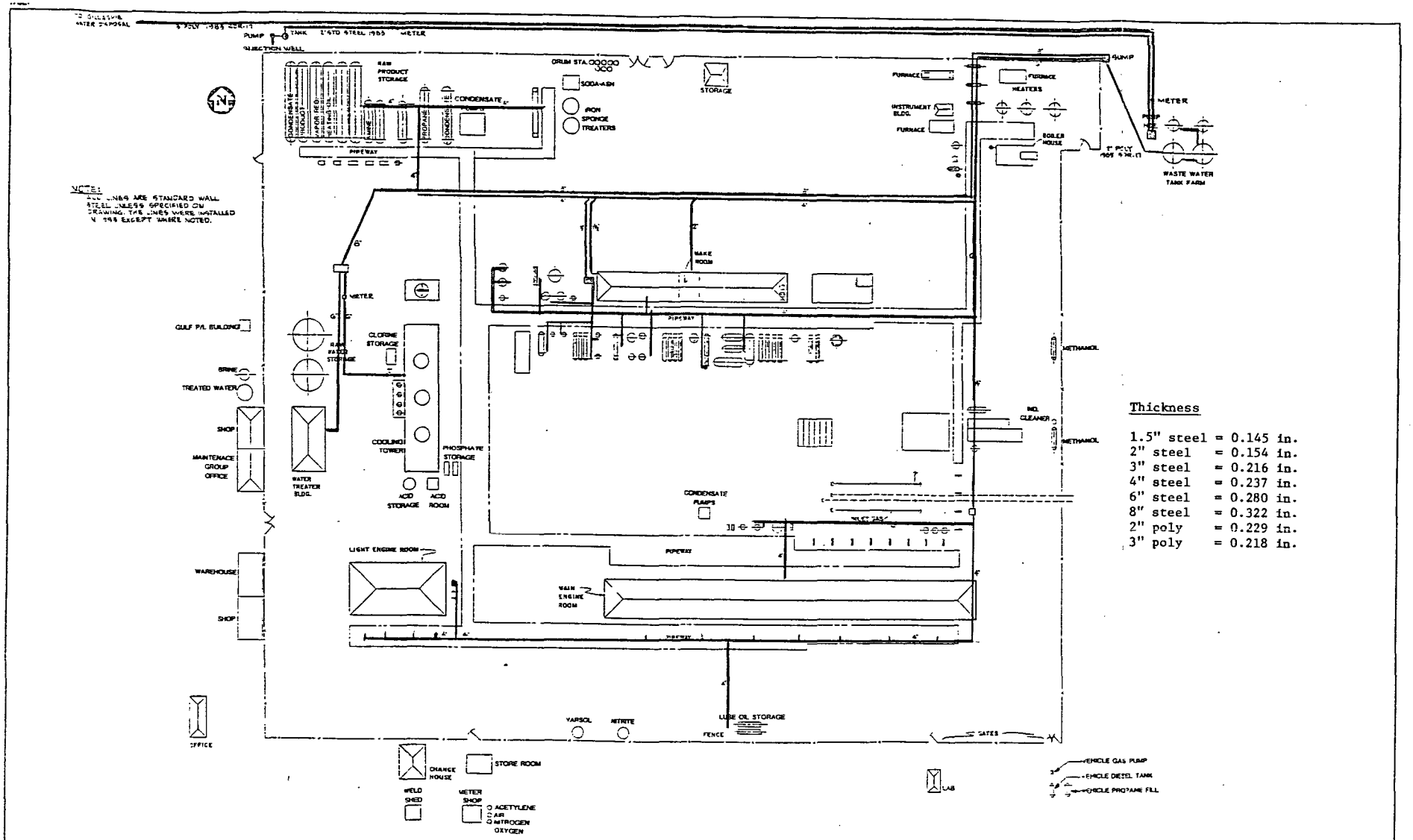
AFE OR NO.
ISSUE
DATE (PRELIM. / CONST.

WARREN PETROLEUM COMPANY
A DIVISION OF GULF OIL CORPORATION

PLANT LAYOUT

VADA PLANT-139

DRAWN R.T.H. DATE 7-9-85 SCALE —
CHECKED DATE
APPD DATE



Thickness

1.5" steel	= 0.145 in.
2" steel	= 0.154 in.
3" steel	= 0.216 in.
4" steel	= 0.237 in.
6" steel	= 0.280 in.
8" steel	= 0.322 in.
2" poly	= 0.229 in.
3" poly	= 0.218 in.

GENERAL NOTES

GENERAL NOTES

ENG. NO. | REFERENCE DRAWINGS

NO. | REVISION | BY | DATE | CHK. | APPR

NO. | REVISION | BY | DATE | CHK. | APPR

APP OR NO

ISSUE

DATE | PRELIM. | CONST

WARREN PETROLEUM COMPANY
A DIVISION OF GULF OIL CORPORATION

PLANT LAYOUT

PLT 146 SAUNDERS LOVINGTON NM

DRAWN BY | DATE | SCALE 1"=50'

CHECKED | DATE

APPR | DATE

STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

TONEY ANAYA
GOVERNOR

50 YEARS
1935 - 1985

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-5800

July 31, 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Warren Petroleum Co.
P. O. Box 1589
Tulsa, Oklahoma 74102

Attention: Ms. L. T. Reed

Dear Ms. Reed:

The following discharge plans have been reviewed by OCD:

-Warren Petroleum Co.'s Monument gas processing plant located in the SW/4 of Section 36, Township 19 South, Range 36 East, NW/4 of Section 36, Township 20 South, Range 36 East, NMPM, Lea County, New Mexico.

-Warren Petroleum Co.'s Saunders gas processing plant located in Section 34, Township 14 South, Range 33 East, NMPM, Lea County, New Mexico.

-Warren Petroleum Co.'s Vada gas processing plant located in Section 23, Township 10 South, Range 33 East, NMPM, Lea County, New Mexico.

The above-listed discharge plans for Warren Petroleum Co.'s Monument (GW-25), Saunders (GW-26), and Vada (GW-27) gas processing plants are hereby approved with the following conditions:

1. Within sixty (60) days of receipt of this letter, the following information concerning any underground wastewater piping for all three plants must be provided:

-A drawing indicating all underground waste-water pipelines for each plant.

-The approximate age and diameter of all underground wastewater pipelines.

-The material specifications and thickness for all underground wastewater pipelines.

-The installation method (e.g. welded, bell and spigot, etc...) for all underground wastewater pipelines.

The information requested is necessary to evaluate the potential for the underground piping to leak and possibly contaminate the groundwater.

2. Within sixty (60) days of receipt of this letter, submit information on the methods for disposal of non-RCRA solid waste disposal including domestic and industrial refuse (e.g., spent catalyst, etc...). This information is required to assure that such disposal methods will not create the potential for groundwater contamination.

The approved discharge plans consist of the plan dated March 1, 1985 and the materials dated May 13, 1985 and July 9, 1985, submitted as supplements to the discharge plan.

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

There will be no routine monitoring or reporting requirements.

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

Pursuant to Subsection 3-109.G.4., this plan approval is for a period of five years. This approval will expire July 31, 1990, and you should submit an application for new approval in ample time before that date.

Please be aware that pending evaluation of the wastewater piping information requested in this letter, submittal of results of hydrostatic tests on the plants' underground wastewater piping may be required for discharge plan renewal. You will be notified of this within ninety (90) days of OCD's receipt of the information requested in this letter.

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

Sincerely,

R. L. STAMETS,
Director

RLS/PB/dr

cc: Oil Conservation Division - Hobbs

Chevron

Warren Petroleum Company
A Division of Chevron U.S.A. Inc.
P.O. Box 1589, Tulsa, OK 74102

Manufacturing Department

July 9, 1985

Mr. Philip L. Baca
Environmental Engineering Specialist
State of New Mexico
Energy and Minerals Department
Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87501

RE: Monument, Saunders and Vada Discharge Plans -
Information Requested for Continued Review Process

Dear Mr. Baca:

The attached information is provided as you requested in your letter of May 17, 1985.

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

Very truly yours,

L. T. Reed, Director
Environmental Affairs

LTR/LLJ/dm

Attachment

INFORMATION REQUESTED
FOR
CONTINUED EVALUATION
OF
DISCHARGE PLANS
FOR
MONUMENT, SAUNDERS & VADA
GAS PROCESSING PLANTS

PART A (1): CHEMICAL ANALYSES.

Additional Chemical analyses for the Monument, Saunders and Vada Plants are attached

Concerning the January 30, 1985 chemical analysis submitted as Appendix B with our updated discharge plans of March 1, 1985, it is our understanding that the specific conductance and total dissolved solids for the Monument and Saunders plants, as well as the ratio between the two parameters, are within expected ranges. For the Vada Plant, the pH and alkalinity are the first indications that amine entered the waste water. Amine has a low specific conductance but a high total dissolved solid calculated count.

PART A (2): SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN - PART II, ALTERNATE A.

(a) All pipeline safety regulations are administered through the New Mexico Corporation Commission as well as the U.S. Department of Transporation. As such, Warren works directly with those agencies with regard to pipeline field and reporting matters.

(b) The term vaporization, used to describe hydrocarbon compounds, is used as a general term to indicate the quality of the material mentioned.

A discharge or spill, as defined by federal and state regulations, is at hand when there is a reasonable probability that the discharged material will reach surface, or subsurface water. Warren has had no spills from delivery lines.

Please note that there is an excess flow valve which will shut off product flow if there is any failure in the connection.

PART A (3): DISPOSAL METHODS

Warren works directly with the U.S. Environmental Protection Agency, Region VI Office and the New Mexico Environmental Improvement Division for continued compliance with Resource Conservation and Recovery Act (RCRA) regulations.

PART B (1): MONUMENT PLANT SPILL PLAN

(a) Any water removed from diked area by vacuum truck is hauled from the plant be Oil Processing Company who in turn reclaims the oil and disposes of the remaining waste water into an approved injection well. Pure rainwater is allowed to evaporate from the plant yard.

(b) As stated in Section I, Part A (5) of the March 1, 1985 Updated Discharge Plans, plant inspections are made at a minimum of three time per day, and most of the time, it is made once every four hours. Any leaks are found and repaired as soon as possible. When tanks are in need of repair, they are either reworked or replaced. Since this method has proved successful in that no spills have occurred from the storage tanks, any other, more formal, means for corrosion checks are not deemed necessary at this time. If we do suspect a problem, a thickness test is run on the tank.

PART B (2) SCHEMATIC OF WASTEWATER SYSTEM FOR MONUMENT PLANT

Attached please find a revised schematic of the Monument Plant Wastewater System.

PART B (3) ACCUMULATION OF SLUDGE FOR MONUMENT PLANT

There has been no accumulation of sludge in the skimmers. Any particles are apparently held in suspension and removed by vacuum.

PART B (4) EVAPORATION PIT LINING MATERIALS FOR MONUMENT PLANT

The lining materials used for the evaporation pit are 36 mil chlorinated polyethylene (CPE) laminate and 30 mil CPE.

PART B (5): EVAPORATION PIT/BRINE PIT AT THE MONUMENT PLANT

The Evaporation Pit is located 1200 feet to the northwest of the amine coolers. The Brine Pit is located 1300 feet to the southwest of the amine coolers. The evaporation pond is usually dry. The brine pond contains only enough water to prevent wind damage to the liner. A plot plan is attached showing these directions from the amine coolers.

PART B (6): SUMP/PUMP INFORMATION FOR THE MONUMENT PLANT

The capacity of each sump is as follows:

North Engine Room Sump 7,200 gallons
South Engine Room Sump 10,200 gallons
East Sump 13,400 gallons
South Sump 11,300 gallons

The capacity of the sump into which all effluent flows is 520 BBLS stored in three tanks. Any overflow would go to the brine pit. The effluent in the tanks is then sent to the Rice Engineering well by gravity feed. There is no pump on the discharge line to Rice Engineering. The sump capacities upstream of the three tanks are listed above. We do not have pump curves for the two pumps that deliver effluent to the three tanks.

PART B (7): MINIMUM FREEBOARD-MONUMENT PLANT

For the Evaporation Pond, the freeboard would be at least two feet beneath the top of the level.

The freeboard for the Brine Pond would be at least two feet beneath the top of the level.

PART C (1): SAUNDERS PLANT EFFLUENT

The Saunders Plant has experienced no process changes that would cause a variance in the quality of the plant effluent from the two dates you question which are February 23, 1983 and January 30, 1985. An evaluation of, and a comparison between, the two samples must be made in light of the fact that the samples are waste water and by that nature, the components will vary. A comparison of each sample with the background analysis will provide further information.

We stated in our March 1, 1985 Update For Discharge Plans along with the January 30, 1985 analyses that to obtain highly consistent analyses of the effluent would be difficult due to the several sources throughout each plant which combine to provide the whole.

PART C (2): SAUNDERS PLANT CONDENSATE

The condensate is held in the storage tank at a pressure of 210 psig. The major constituents of the condensate are: methane (1%), ethane (35%), propane (28%), butanes (17%), pentanes (8%), hexane (11%).

PART C (3): SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN-PART II, ALTERNATE A FOR THE SAUNDERS PLANT.

(a) Sludge accumulation is very slow. When necessary, any sludge is hauled by Gandy vacuum truck to their approved treatment site.

(b) The same information found in PART B(1)(b) regarding tank inspection procedures applies to the Saunders Plant.

The stored acid is 98% sulfuric acid.

(c) CONDENSATE AT THE SAUNDERS PLANT

Condensate at the Saunders Plant is removed by pipeline. Please refer to PART A (2)(b) for further information.

PART C (4): AVERAGE DISCHARGE RATE FROM THE SAUNDERS PLANT

The average discharge rate for the Saunders Plant is 450 bbls/day. Measurement is by meter.

PART D (1): NATURE OF CONDENSATE FOR THE VADA PLANT

The nature of the condensate at the Vada Plant would be similar to that at the Saunders Plant.

PART D (2): VADA SPILL PLAN

(a) The underground tank is visually checked for leaks when it is emptied by vacuum truck. Please refer to PART B(1)(b) for information regarding tank inspections.

(b) Please refer to PART A(2)(b).

PART D (3): VADA EFFLUENT

The open drains are at a higher elevation than the main plant sumps, therefore, there could be no backflow. The main sump pump has a capacity of 125 gpm. The portable gasoline back-up pump has a capacity of approximately 60 gpm. Should the main pump ever fail, a vacuum truck would be called out to maintain an acceptable level within the sump.

The current average discharge rate for the Vada plant is 30 BBLs/day. Measurement is by tank strapping.

PART D (4): SLUDGE ACCUMULATION AT THE VADA PLANT

Any sludge accumulation is removed by vacuum truck for disposal at Gandy's approved site.

TEL. 512-884-0371 PO BOX 2552 78403

JORDAN LABORATORIES, INC.
CHEMISTS AND ENGINEERS
CORPUS CHRISTI, TEXAS
JUNE 27, 1985

WARREN PETROLEUM COMPANY
P.O. BOX 1589
TULSA, OKLAHOMA 74102

REPORT OF ANALYSIS

IDENTIFICATION: W.P.C. VADA
10:00 AM 6-6-85

	MG/L
PHENOLS	13
BENZENE	19.0
TOLUENE	12.0
ORTHOXYLENE AND PARAXYLENE	0.74
METAXYLENE	0.79
ALUMINUM	0.02
ARSENIC	0.006
BORON	1.8
CADMIUM	0.0006
MOLYBDENUM	0.01
NICKEL	0.05

LAB. NO. M23-3541

RESPECTFULLY SUBMITTED,

CARL F. CROWNOVER

TEL. 512-884-0371

PO BOX 2552 78403

JORDAN LABORATORIES, INC.
CHEMISTS AND ENGINEERS
CORPUS CHRISTI, TEXAS
JUNE 27, 1985

WARREN PETROLEUM COMPANY
P.O. BOX 1589
TULSA, OKLAHOMA 74102

REPORT OF ANALYSIS

IDENTIFICATION: W.P.C. SAUNDERS
11:00 AM 6-6-85

	MG/L
PHENOLS	1.3
BENZENE	13.0
TOLUENE	16.0
ORTHOXYLENE AND PARAXYLENE	3.7
METAXYLENE	4.6
ALUMINUM	0.04
ARSENIC	0.029
BORON	0.74
CADMIUM	<0.0001
MOLYBDENUM	0.03
NICKEL	0.02

LAB. NO. M23-3540

RESPECTFULLY SUBMITTED,

CARL F. CROWNOVER

TEL. 512-884-0371

PO BOX 2552 78403

JORDAN LABORATORIES, INC.
CHEMISTS AND ENGINEERS
CORPUS CHRISTI, TEXAS

JUL 2 1985

JUNE 27, 1985

WARREN PETROLEUM COMPANY
P.O. BOX 1589
TULSA, OKLAHOMA 74102

REPORT OF ANALYSIS

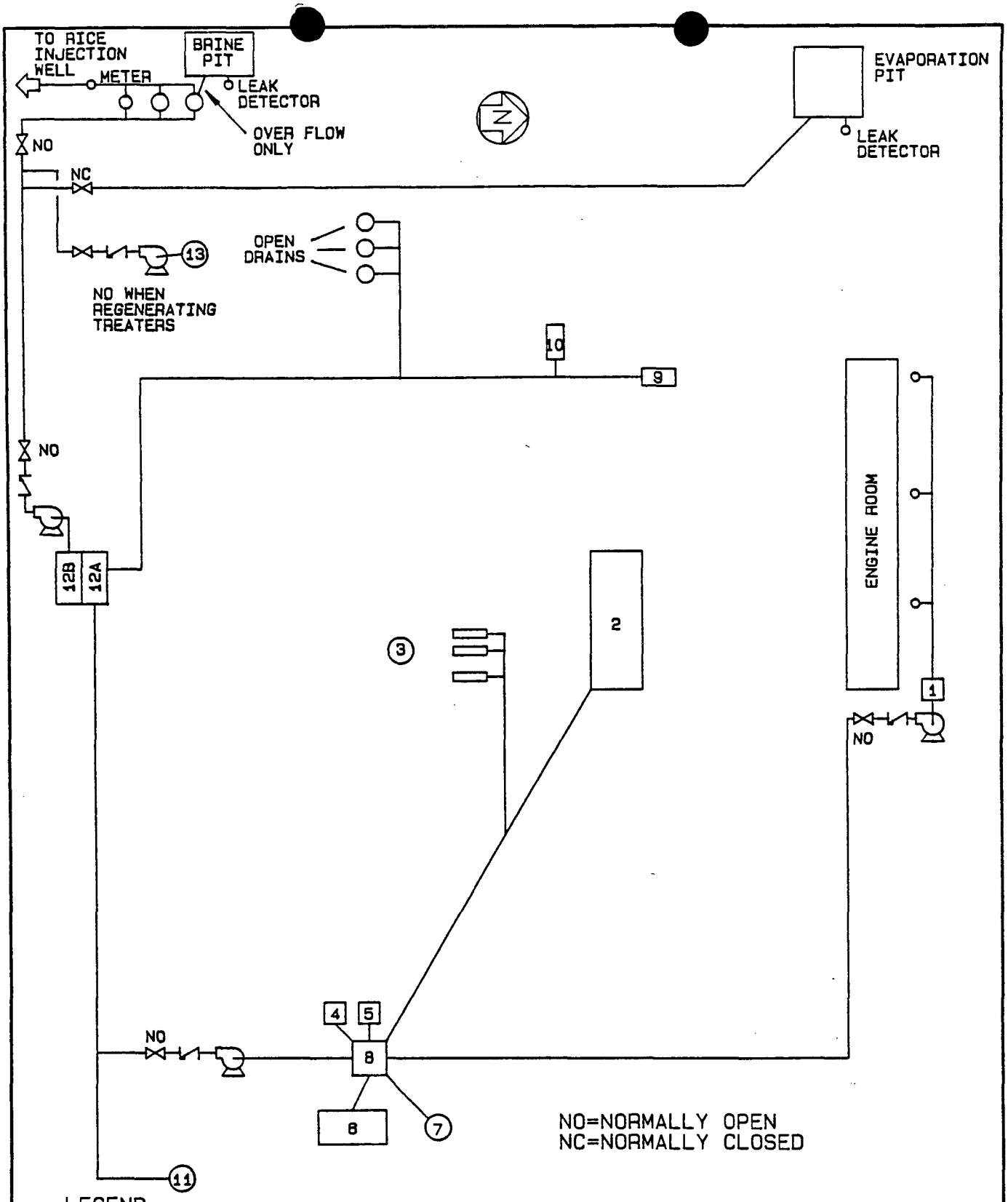
IDENTIFICATION: W.P.C. MONUMENT
2:00 PM 6-6-85

	MG/L
PHENOLS	0.08
BENZENE	0.12
TOLUENE	0.33
ORTHOXYLENE AND PARAXYLENE	0.60
METAXYLENE	0.66
ALUMINUM	0.50
ARSENIC	0.018
BORON	0.56
CADMIUM	<0.0001
MOLYBDENUM	0.01
NICKEL	<0.01

LAB. NO. M23-3539

RESPECTFULLY SUBMITTED,

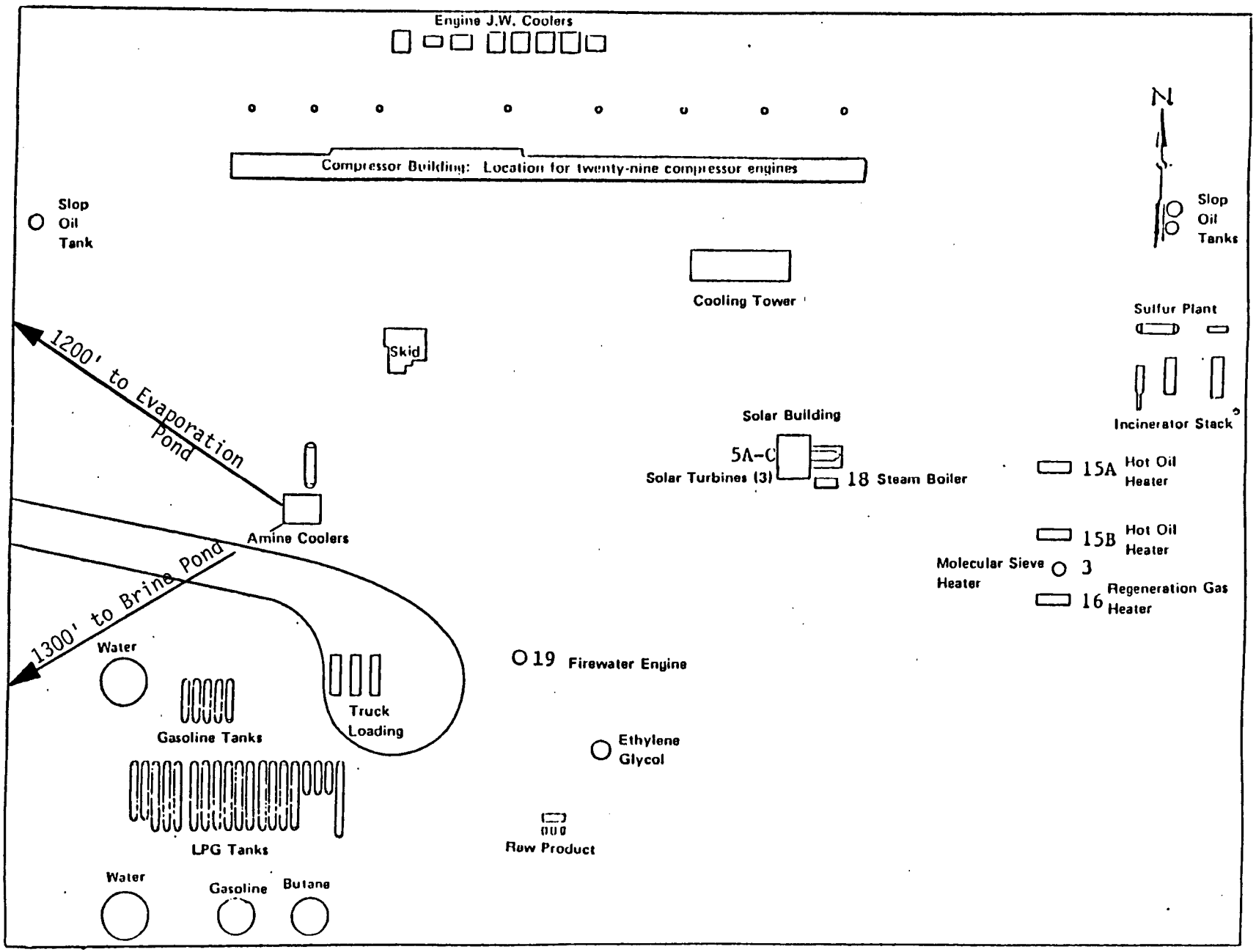
CARL F. CROWNOVER



LEGEND

1-NORTH ENGINE ROOM SUMP
2-COOLING TOWER
3-CONDENSORS
4-BOILER
5-BOILER
6-BOILER
7-H_2S SCRUBBER
8-EAST SUMP
9-SOUTH ENGINE ROOM SUMP
10-CONDENSORS
11-CONDENSATE TANK
12A-SKIMMER
12B-SOUTH SUMP
13-ZEOLITE H_2O TREATER

NO. OF UNITS REQUIRED THUS			NO-AFE NO.
WARREN PETROLEUM COMPANY A DIVISION OF GULF OIL CORPORATION			
WASTE WATER SYSTEM LAYOUT PLANT 118 MONUMENT LEA, COUNTY, NM.			
DRAWN	HPK	DATE 8/25/85	SCALE NONE
CHECKED	LLJ	DATE 8/25/85	DRAWING NO.
APPR.	PDA	DATE 8/25/85	118-1001-0



WARREN PETROLEUM COMPANY
MONUMENT PLANT
PLOT PLAN

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, Warren Petroleum Co., L. T. Reed, Authorized Agent, P.O. Box 1589, Tulsa, Oklahoma 74102, has submitted for approval the following discharge plans to the Director of the Oil Conservation Division, P. O. Box 2088, State Land Office Building, Santa Fe, New Mexico 87501 (505) 827-5800.

Warren Petroleum Co., Monument Gas Processing Plant (SW/4 Section 36, Township 19 South, Range 36 East, NW/4 Section 1, Township 20 South, Range 36 East, NMPM, Lea County, New Mexico) proposes to continue disposing of approximately 50,000 gallons per day of industrial wastewater into a commercial Class II injection well currently operating near the plant. The wastewater is transported to the injection well via pipeline. In the event of an emergency shutdown at the injection well, a lined pond with a leak detection system and a capacity of approximately one million gallons will be used to contain the wastewater temporarily. The wastewater is composed of effluents from cooling towers and process vessels. The wastewater has a total dissolved solids concentration of approximately 2800 mg/l. The ground water most likely to be affected by any non-injection discharges is at depths of 35 to 60 feet with total dissolved solids concentrations ranging from 500 to 3000 mg/l.

Warren Petroleum Co., Saunders Gas Processing Plant (SW/4 Section 34, Township 14 South, Range 33 East, NMPM, Lea County, New Mexico) proposes to continue disposing of approximately 25,000 gallons per day of industrial wastewater into a commercial Class II injection well currently operating near the plant. The wastewater is transported to the injection well via pipeline. In the event of an emergency shutdown at the injection well, the wastewater will be stored in four tanks with a total combined capacity of approximately 100,000 gallons until the wastewater can be transported by truck to an approved disposal site. The wastewater is composed of effluents from cooling towers and process vessels. The wastewater has a total dissolved solids concentration range of 3,800 to 10,000 mg/l. The ground water most likely to be affected by any non-injection discharges is at a depth of approximately 100 feet with a total dissolved solids concentration of approximately 600 mg/l.

Warren Petroleum Co., Vada Gas Processing Plant (NW/4 Section 23, Township 10 South, Range 33 East, NMPM, Lea County, New Mexico), proposes to continue disposing of approximately 630 gallons per day of industrial wastewater into two storage tanks with a total combined capacity of approximately 12,000 gallons. From the tanks, the wastewater is transported via truck to an approved disposal site. The wastewater has a total dissolved solids concentration of approximately

15,000 mg/l. The ground water most likely to be affected is at a depth of approximately 35 feet with an estimated total dissolved solids concentration of 1000 mg/l.

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

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

GIVEN Under the Seal of the New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 17th day of May, 1985.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

R. L. STAMETS
Director

S E A L

Chevron

Warren Petroleum Company
A Division of Gulf Oil Corporation
P.O. Box 1589, Tulsa, OK 74102

May 13, 1985

State of New Mexico
Energy and Minerals Department
Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87501

Attn: Philip L. Baca
Environmental Engineer

Re: Monument, Saunders and Vada Discharge Plans -
Information Requested for Continued Review Process

Dear Mr. Baca:

According to your request of May 3, 1985, the following information is offered so that the public notification of our subject Discharge Plans can be completed by your agency. This material was given to you by telephone on May 13, 1985.

The effluent disposal rate for our Monument Plant is 1200 barrels per day. The evaporation pond is usually dry. The brine pond contains only enough water to prevent wind damage to the liner.

For our Saunders Plant, the amount of total dissolved solids in the effluent will vary due to the fact that several sources combine to form the waste water. Waste water analyses have shown a range of total dissolved solids from 3881 ppm to 10,589 ppm.

For the Vada Plant, the amount of discharge to the API holding tanks is 15 barrels per day; the actual combined storage for the two tanks is 300 bbls. The maximum capacity of the west tank is 300 bbls; for the east tank is 210 bbls.

We are currently gathering information to answer your letter of April 1, 1985. If in the meantime, you find that you have any questions or need further information, please contact Linda Johnson or me at (918) 560-4138.

Very truly your,

L. T. Reed, Director
Environmental Affairs

STATE OF NEW MEXICO

OIL CONSERVATION DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone ☐ Personal	Time 8:30 am	Date 5/13/85
Originating Party	Other Parties	
L. Johnson - Warren Pet. Co.	P. Baca - OCD	

Subject: Information requested by P. Baca in phone conversation of 5/3/85.

Discussion: Ms. Johnson conveyed the following info. to me so that a Public Notice could be drafted:

~~Monument~~ Saunders Plant: TDS ranges from 3,881 to 10,589

Monument Plant: Brine Pond has water added to it to protect membrane & evap. pond is usually dry. Effluent rate is 1200 BBL/Day.

Vada Plant: API tanks combined capacity is 300 BBL. Effluent rate is 15 BBL/Day

Conclusions or Agreements: P. Baca will prepare Public Notice for Publication

Distribution

Signed Philip L. Baca

STATE OF NEW MEXICO

OIL CONSERVATION DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

☑ Telephone ☐ Personal	Time 945 am	Date 5-3-85

Originating Party	Other Parties
P. Baca - OCD	Warren Pet. Co. - L. Johnson

Subject: Advertisement information for Warren's Monument, Saunders, and Vada discharge plans.

Discussion: I informed Ms. Johnson we needed information on the Monument ponds (lined), Saunders effluent (accurate TDS), Vada effluent rate, and Vada holding tank capacity. I also informed her on our sampling and preserving techniques for water sampling. I told her that we need to have the information requested in the OCD letter of 4-1-85 by 6-7-85.

Conclusions or Agreements: Ms. Johnson will phone in the information requested for the advertisement and will submit the additional requested information by June 7, 1985.

Distribution

Signed Philip L. Baca

STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

50 YEARS
1935 - 1985

TONEY ANAYA
GOVERNOR

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-5800

April 1, 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Attention: Ms. L. T. Reed

Re: Discharge Plans for
Monument, Saunders,
and Vada Plants

Dear Ms. Reed:

We have received your updated discharge plans dated March 1, 1985, for the Warren Petroleum Co. Monument, Saunders, and Vada gas processing plants. To continue with the review process, we must request the following information:

A. Information needed for the Monument, Saunders, and Vada Plants:

1. The Chemical analysis of the effluent streams for all three plants lacked an analysis for several constituents. Please obtain water samples of the effluent stream for each plant and have them analyzed for phenols, aluminum(Al), boron (B), molybdenum (Mo), nickel (Ni), arsenic (As), cadmium (Cd), benzene, toluene, and meta-, ortho-, and para-xylenes. In a phone conversation with Ms. L. Johnson on 3/22/85, it was indicated that Warren Petroleum Co. had been quoted a price of $1,000 per plant for an analysis for benzene, toluene, and the xylenes. This price seems to be very high as prices generally range from $75-$100 per sample for the same scan using gas chromatograph analysis (this price range is based upon our own experience with the State Laboratory and with private laboratories). The analysis for Al, B, Mo, Ni, As, and Cd can probably all be done with one ICAP Scan. The

analysis for phenols can be done by colorimetric /distillation methods. The water analysis submitted with the discharge plan had a specific conductance with a value smaller than the value for the total dissolved solids for each plant. Please comment as this is an unusual phenomenon. Please describe the method used for collecting the samples and indicate whether or not the samples were filtered and/or acidified.

2. The following questions pertain to the Spill Prevention Control Countermeasure Plan, Part II, Alternate A:

a. In Sections C.1. a & b you indicate that buried pipelines are wrapped, coated, and cathodically protected to reduce corrosion. Please submit a drawing showing all buried pipelines and the location of the sacrificial anodes used for cathodic protection. Please submit information on the materials of construction for the pipe and sacrificial anodes. Also state the nature of the wrapping material and pipe coating. How old are the buried pipelines?

b. In Section D.3 you state that the products loaded and unloaded at the facilities are gaseous at atomospheric conditions. What about the gasoline tanks at the Monument plant and the condensate tanks at the Saunders and Vada plants? Have "flash evaporation" calculations been made for these fluids to prove immediate vaporization? Are "quick disconnect" fittings (e.g., Kanvalok or Snap-tite) used on transfer lines to minimize spills from delivery lines?

3. Appendix D gives a good process description of the gas processing industry. Please indicate the methods used for the three N.M. plants in question. If a molecular sieve dehydration system is used, please indicate the frequency and disposal methods used for replacing the spent dessicant, and the type of dessicant used.

B. Information need for the Monument Plant:

1. The following questions pertain to the Spill Prevention and Countermeasure Plan, Part II, Alternate A included in Appendix C.

a. When a vacuum truck picks up water from

diked areas, where is the water disposed of? Where is the pure rainwater drained to? (Ref. Section A.1 and A.3)

b. In Section B.3, you indicate that tanks are externally inspected for rust, corrosion, and leaks. What is the frequency of such an inspection and what is the method of inspection? Please comment on the possibility of checking for internal corrosion (e.g., using ultrasonics) for tanks that contain corrosive substances.

2. The schematic of the wastewater system for the Monument plant included in Part V of the Spill Prevention and Countermeasure Plan is a bit confusing. Please clarify the schematic by submitting the following information:

a. Indicate the flow path directions; I believe the drawings for the pumps near items 14B and 15 are backwards.

b. Label normally open and normally closed valves.

c. Include any paths that deposit effluent in the slop oil tanks; e.g., from skimmers 14A and 2.

d. Locate any check valves that are in the system to prevent backflow.

3. Does any sludge accumulate in the skimmers? If so, how and where is it disposed of?

4. Provide information on the lining materials used for the evaporation pit.

5. Please locate the evaporation and brine pits on the plot plan for the Monument plant included in Appendix G. Your discharge plan infers that both pits are generally dry, is this a correct assumption?

6. What is the capacity of the sump to which all the effluent flows prior to being pumped to the injection well? Provide pump specifications for the pump used to transport effluent to the injection well; a pump curve with the operating point indicated will be sufficient.

7. What is the minimum freeboard allowed in the evaporation and brine pits?

C. Information needed for the Saunders Plant:

1. The chemical analysis for the effluent submitted with this discharge plan varies significantly with the analysis submitted with your injection well application (SWD-255). The analysis for the discharge plan and injection well application are attached for your inspection. Have any process changes been made that would explain such a change?

2. At what pressure is the condensate held in the storage tank? What are the major constituents of the condensate?

3. The following questions concern Part II, Alternate A of your Spill Pervention Control and Countermeasure Plan:

a. Section A.2 indicates that oil and water are separated in the storage tank. Does any sludge accumulate in this tank, and if so, how and where is it disposed of?

b. In Section B.3 you state that no internal tank inspections are made since no corrosive products are stored; however, the effluent wastewater is probably mildly corrosive (on the order of 0.01 in./yr. for steel) and the acid is most definitely corrosive. Please comment on the possibility of a routine check for internal corrosion (e.g., using ultrasonic methods) on the wastewater and acid storage tanks. What type of acid is stored and what is its concentration?

c. Section D.3. states that products loaded/unloaded will vaporize at atmospheric pressure. Does the condensate tank ever unload its contents to a carrier? What is the method of unloading? Are hoses with "quick disconnect" fittings (e.g., "Kanvalok" or "Snaptite") used to help prevent spills from the delivery hose?

4. Is the average discharge rate from the plant still 450 barrels/day? How was this measured?

D. Information needed for the Vada plant:

1. Is the condensate at this plant similar in nature to the condensate at the Saunder plant?

2. The following questions pertain to Part II, Alternate A of the Spill Prevention and Countermeasure Plan:

a. How is the buried tank for the generator sump checked for leaks? Please comment on the possibility of checking for internal corrosion in the scrubber oil tanks and generator sump.

b. If complete condensate vaporization can't be shown, please comment on the methods used (i.e., type of delivery hose and fittings) to prevent spills during condensate loading to a tanker truck.

3. In the wastewater system schematic included in Appendix H, does the design for the open drains (#8 on schematic) include provisions to prevent backflow onto the ground should a flow surge or plug-up occur at the main plant sump (#7 on schematic)? What is the capacity of the main plant sump pump? What is the capacity of the back-up pump? What is the plant effluent discharge rate? How was this rate measured?

4. Does any sludge accumulate in the sumps or scrubber oil tanks? If so, how is this removed and where is it disposed of?

Your cooperation in this effort is greatly appreciated. If you have any questions concerning this letter, or the discharge plan review process, please feel free to call me at (505) 827-5812.

Sincerely,

PHILIP L. BACA
Environmental Engineer

PLB/dp

Enc.

cc: R. L. Stamets, Director
T. Sexton, OCD Hobbs Office

STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

TONEY ANAYA
GOVERNOR

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-5800

December 28, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Attention: Ms. L. T. Reed

Dear Ms. Reed:

We have received your letter dated December 17, 1984, requesting an extension to operate the Vada, Monument and Saunders gas processing plants without approved discharge plans. By your letter, we understand that the information requested by OCD will be submitted by March 1, 1985.

Pursuant to Section 3-106.A. of the New Mexico Water Quality Control Commission Regulations and for good cause shown, Warren Petroleum Co. is hereby granted its request for an extension until June 30, 1985, to operate the Vada, Monument, and Saunders gas processing plants without approved discharge plans provided that all information requested by the OCD in a letter dated November 6, 1984, and phone conversation with Ms. L. Johnson on December 21, 1984, is submitted by March 1, 1985.

It is our understanding that operations at the Snyder Ranch Plant were discontinued on July 2, 1984. Therefore, a discharge plan for the plant will not be required at this time; however, upon resumption of operations, the OCD must be notified and a discharge plan must be submitted within 120 days of resumption, unless a request for an extension is granted.

If you have any questions on this extension, or on the discharge plan process, please feel free to contact Dave Boyer or Phil Baca at (505) 827-5812.

Sincerely,

R. L. STAMETS
Director

RLS/PB/dp

cc: OCD-Hobbs

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

☑ Telephone ☐ Personal | Time 11:30 | Date 12/21/84

Originating Party	Other Parties
O.C.D. - (P. Baca)	Warren Petroleum - (Linda Johnson)

Subject D.P. For Monument, Saunders, and Vada Gas Processing Plants

Discussion Expanded information on what was needed for water analysis. Outlined what we needed from WQCC 3-103 and added ethylbenzene, p, m, o- xylenes. Told her we also needed analysis of water in brine pond.

Conclusions or Agreements

Distribution

Signed P. L. Baca

WASTE MANAGEMENT PLAN

VADA GAS PROCESSING PLANT

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

At the present time, the Vada Plant does not generate any RCRA hazardous wastes. If or when it should be determined a hazardous waste exists, it will be disposed of according to RCRA standards with documentation and proper manifests in an approved hazardous waste disposal site. Formal contracts will be negotiated and disposal site inspections will be performed.

1. The following list shows the types, expected amounts, and source of wastes which are generated at the Vada Plant:

TYPE	EXPECTED AMOUNT	SOURCE
Filter Cartridges	759/year	Oil Filter, Dehydrator Dust Filters, Air Filters, Amine Filters
Process Waste Water	12,000 Bbls/yr.	Wash Water, Produced Water
Plant Trash	8 Tons/yr.	Office Trash, Wood, Cardboard, Miscellaneous
Sump & Tank Bottoms	60 Bbls/yr.	Scrubber Oil Tanks, Plant Sumps
Steel Drums	10 year	Chemical & Oil Drums
Molecular Sieve	1.5 Tons/year	Gas Dehydrators
Ion Exchange Resin	50 Lb/year	Water Softeners
Selica Gel	100 Lb/year	Instrument Air Dehydrators
Scrap Metal	5 Tons/year	Various
Used Oil	1,500 Bbls/yr.	Engines
Spent Charcoal	84 Bushels/yr.	Amine Filter

1a. If asbestos or PCB's are encountered, they will be tagged and when necessary disposed of according to approved methods.

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

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

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

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

6. Following is the proper disposal methods in use for each of the waste items listed in No. 1:

TYPE	DISPOSAL METHOD
Filters	Waste Control of New Mexico
Process Waste Water	Trucked to a permitted disposal well
Plant Trash	Waste Control of New Mexico
Sump & Tank Bottoms	Vacuum trucked to treating Plant
Steel Drums	Rinsed, crushed and sold to a scrap dealer (those that are not returnable)
Molecular Sieve	Buried on site

6. Contd.

TYPE	DISPOSAL METHOD
Ion Exchange Resin	Buried on site
Silica Gel	Buried on site
Scrap Metal	Sold to scrap dealer
Used Oil	Added to scrubber oil sales
Spent Charcoal	Buried on site

Plant Manager Approval

Environmental Department Approval

STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

50 YEARS
1935 - 1985

TONEY ANAYA
GOVERNOR

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-5800

October 18, 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Attention: Ms. L. T. Reed

Re: Dicharge Plans for Monument (GW-25), Saunders (GW-26) and Vada (GW-27) Gas Processing Plants - Lea County, NM

Dear Ms. Reed:

The information that was stipulated for approval of the subject discharge plans has been reviewed and accepted by OCD. The above-listed discharge plans are hereby approved for a period of five years. This approval will expire July 31, 1990, and you should submit an application for new approval in ample time before that date.

Hydrostatic tests on the Saunders underground wastewater piping will be required for discharge plan renewal in 1990. Hydrostatic tests of underground wastewater piping at the Vada plant will not be required until 1995.

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

Sincerely,

R. L. STAMETS
Director

RLS/JB/dp

cc: Oil Conservation Division - Hobbs

NWR

Warren Petroleum Company

MANUFACTURING DEPARTMENT

P. O. Box 1589
Tulsa, Oklahoma 74102

December 17, 1984

State of New Mexico
Energy and Minerals Department
Oil Conservation Division
Box 2088
State Land Office Building
Santa Fe, New Mexico 87501

Attn: Philip L. Baca, Environmental Engineer

Re: Discharge Plans for Vada, Monument, Saunders, and Snyder Ranch

Dear Mr. Baca:

We are gathering the information that you requested in your letter of November 6, 1984 for the referenced discharge plans and plan to have it to you by March 1, 1985. We would appreciate your approval of this time schedule and your approval of our operating the Vada, Monument, and Saunders Gas Processing Plants without approved discharge plans until we can get this information to you.

The operation of the Snyder Ranch Plant discontinued on July 2, 1984, therefore, we will not be submitting a discharge plan for the Snyder Ranch Gas Processing Plant at this time.

We appreciate your help in compiling these plans. Please feel free to call me or Linda Johnson at (918) 560-4119 if you have any questions.

Very truly yours,

L. T. Reed, Director
Environmental Affairs

STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

December 14, 1984

TONEY ANAYA
GOVERNOR

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-5800

Warren Petroleum Co.
P. O. Box 1589
Tulsa, Oklahoma 74102

Attention: Ms. L. T. Reed

Dear Ms. Reed:

Please find enclosed a copy of the New Mexico Water Quality Control Commission regulations as amended through November 17, 1983. Please note Section 3-106 of the regulations which outlines the time limits, time extension allowances, and information required for discharge plans.

As per our phone conversation of December 13, we look forward to receiving a request for time extensions with respect to submitting revised discharge plans and for discharging without approved discharge plans at your Monument, Saunders, Vada, and Snyder Ranch plants. If possible, please include a schedule for submitting the plans with your request for an extension.

Please feel free to call me at (505) 827-5812 if you have any questions concerning the discharge plans.

Sincerely,

Philip L. Baca

PHILIP L. BACA
Environmental Engineer

PLB/dr

enc.

Warren Petroleum Company

MANUFACTURING DEPARTMENT

P. O. Box 905
Tatum, New Mexico 88267

November 13, 1978

Oil Conservation Division
P. O. Box 1980
Hobbs, N.M. 88240

Atten: Mr. Eddie Seay

Subject: Pits, Ponds and Lagoons Associated with Refining and Gasoline Plant Operations

The Warren Petroleum Company Vada Plant #139 and Tatum Plant #114 do not have any pits. All waters are trucked to disposal or pumped to Rice Engineering.

Sincerely,

V. H. Potter
Plant Manager, Vada/Tatum

LGC/jky

xc: M. L. Ingram

OK
No Pits
11/25/79

STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

TONEY ANAYA
GOVERNOR

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-5800

November 6, 1984

VADA T10S R33E Sec. 23

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

Attention: Mr. L. T. Reed

Dear Sir:

We have received your updated discharge plans for the Warren Petroleum Company Monument, Saunders, and Vada gas processing plants. To continue with the review process, we must request the following information:

A. Information needed for the Monument, Saunders, and Vada discharge plans.

1) Topographic maps of plant sites.

2) Chemical Analysis of plant effluent stream. Should include analyis for TDS, ph, major cations/anions, heavy metals, hydrocarbons (i.e. benzene, phenols, toluene). Give a brief description of sampling technique. Indicate whether or not (and why) major fluctuations in the results can be expected.

Same Comments as Monument

3) Description of waste oil disposal (from equipment or process), if any. Stored and sold

4) Description of procedures addressing containment and clean-up in case of spills. See comments in App. C

5) Description of inspection procedures (and frequency) for leaks in piping and equipment.

6) A brief description of the plant process; a process flow diagram would be helpful.

Same Comments As Monument

7) Describe site characteristics:

- Hydrologic Features: Provide the name, description, and location of any bodies of water, streams (indicate perrenial or intermittent), other water courses (arroyos, canals, drains, etc.), and ground water discharge sites (water wells, seeps, springs, swamps) within one mile of the outside perimeter of the facility. For water wells, specify use of water. Provide the depth to, and total dissolved solids concentration (in mg/l) of the ground water most likely to be affected, and direction of flow, if known. Include any sources of information or methods of deriving information.

- Geologic Description: Include soil type(s), name of aquifer(s), aquifer material (e.g. alluvium, basalt, etc.), and depth to rock at base of alluvium (if available).

- Flood Protection: Provide information on flooding potential and protection measures (curbs, berms, channels, etc.), if applicable. See App. C

B. Information needed for the Monument discharge plan only:

1) Contingency plan in the event of a shut-down at the injection well.

2) Status of old evaporation pit. Is it filled in? If not, will it ever be used as part of a contingency plan? If so, please send construction details.

3) Is overflow to brine pit allowed to evaporate, or is it pumped to the injection well during periods of low effluent flow from the production area?

4) Provide a plant layout similar to that provided in the Vada plant discharge plan.

C. Information needed for the Saunders discharge plan only:

1) Status of the retention ponds. Are they filled in, or will they be used as part of a contingency plan? If so, please send construction details.

2) Describe the contingency plan in the event of a shut-down at the Gillespie injection well.

3) Provide a schematic diagram of the waste water disposal system (similar to that submitted for the Monument plant) including process waste lines and plant drainage. See comments on sketch in App. C.

4) Provide a plant layout similar to that provided for the Vada plant discharge plan.

5) Describe the disposition, volume, and materials of construction for the four surge tanks.

6) Is there a periodic inspection of the polyethylene pipeline to the Gillespie injection well? Is there a periodic inspection of the check valve? At what depth below the lease road is the pipeline to the Gillespie well? What measures were taken to prevent fractures in the pipeline due to heavy (mass) road traffic?

D. Information needed for the Vada discharge plan only:

1) Provide a schematic diagram of the waste water disposal system (similar to that submitted for the Monument plant) including process waste lines and drainage. See Comments on Sketch in App C.

2) Is the area around the API tanks curbed? Is there a level indicator for the tanks?

3) Provide the quantity of effluent discharged and method of measurement. No indication of quantity

4) Describe sump construction; provide drawings, if available.

5) Describe a contingency plan in the event of a tank shut-down (i.e. leaks, filled to capacity, etc.) or sump pump shut-down.

Your continued cooperation in this effort will greatly expedite the review process. If you have any questions, please do not hesitate to call me at (505) 827-5812.

Sincerely,

Philip L. Baca

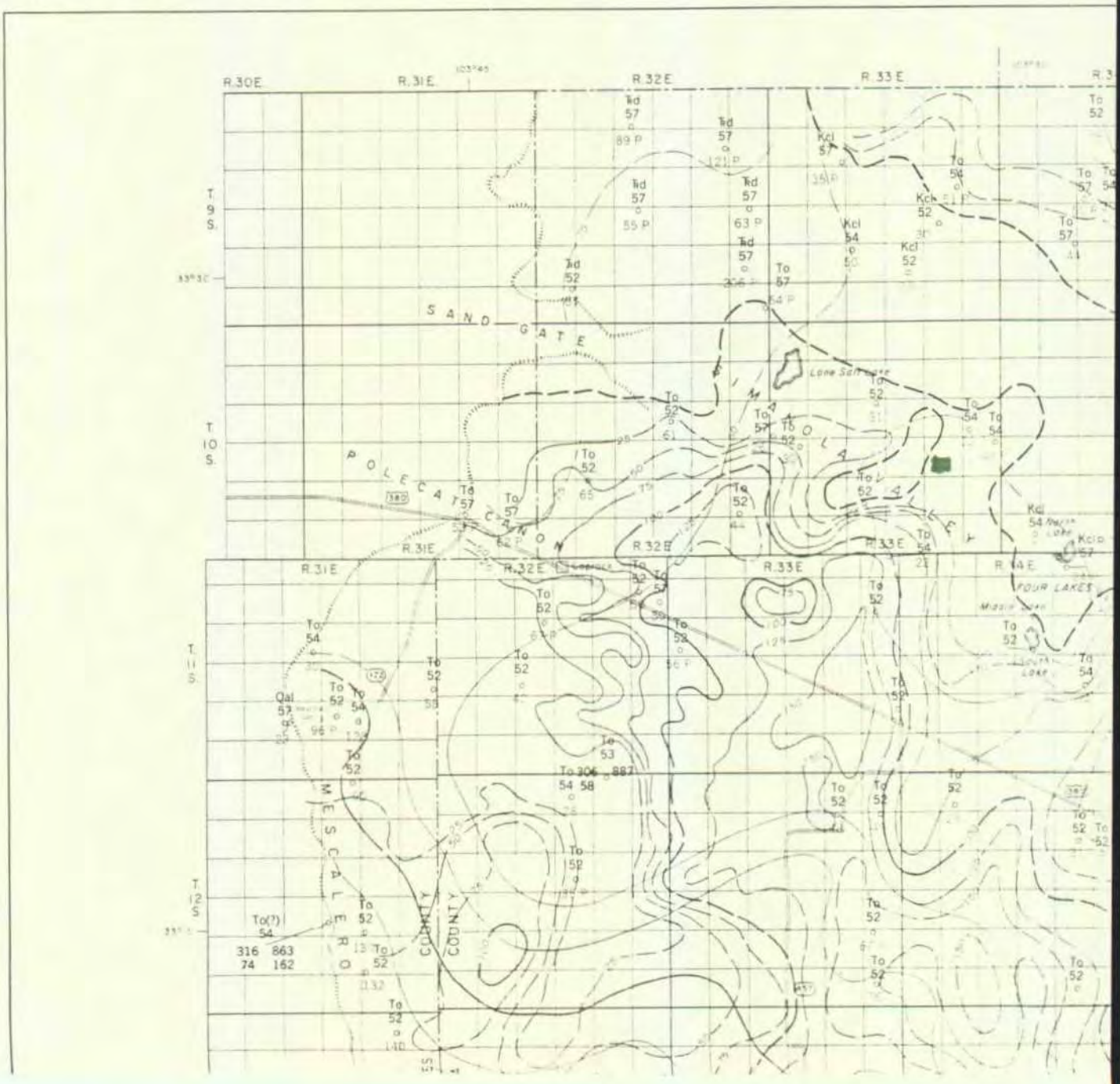
PHILIP L. BACA
Environmental Engineering
Specialist

PLB/dp

cc: R. L. Stamets, Director
D. G. Boyer

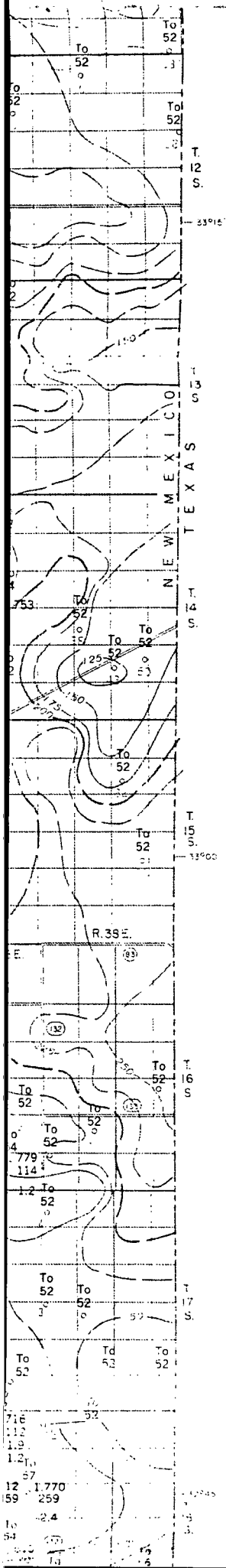
VADA

DEPARTMENT OF THE INTERIOR
UNITED STATES GEOLOGICAL SURVEY



■ Approx. Location of Vada Plant

EXPLANATION ON NEXT PG.



Upper Triassic

Blackdom group, undivided

Maroon, red, and gray irregularly-bedded sandstone, bright- and dark-red shale and sandy shale, and purplish limestone pebble beds

TRIASSIC

Pgs

Grayburg formation and San Andres limestone, undivided

Sandy dolomite with interbedded dolomitic sand; porous white limestone; known only from logs of oil wells

PERMIAN

PIPl

Limestone

White to light gray crystalline limestone with vuggy porosity and occasional green shale partings; known only from logs of oil wells

PENNSYLVANIAN AND PERMIAN

CARBONIFEROUS

pPd

Dolomite

Sandy porous dolomite and vuggy crystalline dolomite; known only from logs of oil wells

PRE-PENNSYLVANIAN

PRE-MESOZOIC

o Water well

■ Oil and gas well location near center of field

ρ Spring

Aquifer — To — *Year sampled*

57

Hardness as $CaCO_3$ (ppm) — 198

543 — *Specific conductance (micromhos at 25°C)*

o

Chloride (ppm) — 45

91 — *Sulfate (ppm)*

1.2 — *Fluoride (ppm)*

150 1.5 — *Sodium-adsorption ratio*

Depth to water, in feet, below land surface datum. Static-level measurement unless the figure is followed by the capital letter "P" which indicates that the measurement was made while the well was being pumped.

Data are grouped around the source-of-water symbol. Undetermined information is noted by the absence from the designed position in the group of data.

Line connecting points of approximately equal depth to water below land-surface datum as of 1952

Dashed where inferred; interval 25 feet

150

Line connecting points of approximately equal saturated thickness of the deposits of Cenozoic age as of 1952

Dashed where inferred; interval 25 feet

Approximate boundary of bedrock highs that interrupt the water table in the deposits of Cenozoic age

B. Other Standards for Domestic Water Supply

Chloride (Cl)	250. mg/l 200
Copper (Cu)	1.0 mg/l Wel
Iron (Fe)	1.0 mg/l 1.3
Manganese (Mn)	0.2 mg/l
Phenols	0.005 mg/l
Sulfate (SO_4)	600. mg/l 2410
Total Dissolved Solids (TDS)	1000. mg/l 14894
Zinc (Zn)	10.0 mg/l 0.08
pH	between 6 and 9 10.3

C. Standards for Irrigation Use - Ground water shall meet the standards of subsections A, B, and C unless otherwise provided.

Aluminum (Al)	5.0 mg/l
Boron (B)	0.75 mg/l
Cobalt (Co)	0.05 mg/l Wel
Molybdenum (Mo)	1.0 mg/l
Nickel (Ni)	0.2 mg/l

3-104. DISCHARGE PLAN REQUIRED.--Unless otherwise provided by these regulations, no person shall cause or allow effluent or leachate to discharge so that it may move directly or indirectly into ground water unless he is discharging pursuant to a discharge plan approved by the director. When a plan has been approved, discharges must be consistent with the terms and conditions of the plan.

3-105. EXEMPTIONS FROM DISCHARGE PLAN REQUIREMENT.--Sections 3-104 and 3-106 of these regulations do not apply to the following:

A. Effluent or leachate which conforms to all the listed numerical standards of Section 3-103 and has a total nitrogen concentration of 10 mg/l or less, and does not contain any toxic pollutant. To determine conformance, samples may be taken by the agency before the effluent or leachate is discharged so that it may move directly or indirectly into ground water; provided that if the discharge is by seepage through non-natural or altered natural materials, the agency may take samples of the solution before or after seepage. If for any reason the agency does not have access to obtain the appropriate samples, this exemption shall not apply.

B. Effluent which is discharged from a sewerage system used only for disposal of household and other domestic waste which receives 2,000 gallons or less of liquid waste per day;

VADA

range and the maximum allowable concentration in ground water for the contaminants specified unless the existing condition exceeds the standard or unless otherwise provided in Subsection 3-109.D. or Section 3-110. When an existing pH or concentration of any water contaminant exceeds the standard specified in Subsection A, B, or C, the existing pH or concetration shall be the allowable limit, provided that the discharge at such concentrations will not result in concentrations at any place of withdrawal for present or reasonably foreseeable future use in excess of the standards of this section.

These standards shall apply to the dissolved portion of the contaminants specified with a definition of dissolved being that given in the publication "Methods for Chemical Analysis of Water and Waste of the U.S. Environmental Protection Agency," with the exception that standards for mercury and the organic compounds shall apply to the total unfiltered concentrations of the contaminants.

A. Human Health Standards—Ground water shall meet the standards of Section A and B unless otherwise provided.

Arsenic (As)	0.1 mg/l
Barium (Ba)	1.0 mg/l Nil
Cadmium (Cd)	0.01 mg/l
Chromium (Cr)	0.05 mg/l 0.02
Cyanide (CN)	0.2 mg/l
Fluoride (F)	1.6 mg/l
Lead (Pb)	0.05 mg/l Nil
Total Mercury (Hg)	0.002 mg/l
Nitrate (NO_3 as N)	10.0 mg/l
Selenium (Se)	0.05 mg/l
Silver (Ag)	0.05 mg/l
Uranium (U)	5.0 mg/l
Radioactivity: Combined Radium-226 and Radium-228	30.0 pCi/l
Benzene	0.01 mg/l
Polychlorinated biphenyls (PCB's)	0.001 mg/l
Toluene	15.0 mg/l
Carbon Tetrachloride	0.01 mg/l
1, 2-dichloroethane (EDC)	0.02 mg/l
1, 1-dichloroethylene (1, 1-DCE)	0.005 mg/l
1, 1, 2, 2-tetrachloroethylene (PCE)	0.02 mg/l
1, 1, 2-trichloroethylene (TCE)	0.1 mg/l

STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

TONEY ANAYA
GOVERNOR

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-5800

November 6, 1984

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

Attention: Mr. L. T. Reed

Dear Sir:

We have received your updated discharge plans for the Warren Petroleum Company Monument, Saunders, and Vada gas processing plants. To continue with the review process, we must request the following information:

A. Information needed for the Monument, Saunders, and Vada discharge plans.

1) Topographic maps of plant sites.

2) Chemical Analysis of plant effluent stream. Should include analyis for TDS, ph, major cations/anions, heavy metals, hydrocarbons (i.e. benzene, phenols, toluene). Give a brief description of sampling technique. Indicate whether or not (and why) major fluctuations in the results can be expected.

3) Description of waste oil disposal (from equipment or process), if any.

4) Description of procedures addressing containment and clean-up in case of spills.

5) Description of inspection procedures (and frequency) for leaks in piping and equipment.

6) A brief description of the plant process; a process flow diagram would be helpful.

7) Describe site characteristics:

- Hydrologic Features: Provide the name, description, and location of any bodies of water, streams (indicate perrenial or intermittent), other water courses (arroyos, canals, drains, etc.), and ground water discharge sites (water wells, seeps, springs, swamps) within one mile of the outside perimeter of the facility. For water wells, specify use of water. Provide the depth to, and total dissolved solids concentration (in mg/l) of the ground water most likely to be affected, and direction of flow, if known. Include any sources of information or methods of deriving information.

- Geologic Description: Include soil type(s), name of aquifer(s), aquifer material (e.g. alluvium, basalt, etc.), and depth to rock at base of alluvium (if available).

- Flood Protection: Provide information on flooding potential and protection measures (curbs, berms, channels, etc.), if applicable.

B. Information needed for the Monument discharge plan only:

1) Contingency plan in the event of a shut-down at the injection well.

2) Status of old evaporation pit. Is it filled in? If not, will it ever be used as part of a contingency plan? If so, please send construction details.

3) Is overflow to brine pit allowed to evaporate, or is it pumped to the injection well during periods of low effluent flow from the production area?

4) Provide a plant layout similar to that provided in the Vada plant discharge plan.

C. Information needed for the Saunders discharge plan only:

1) Status of the retention ponds. Are they filled in, or will they be used as part of a contingency plan? If so, please send construction details.

2) Describe the contingency plan in the event of a shut-down at the Gillespie injection well.

3) Provide a schematic diagram of the waste water disposal system (similar to that submitted for the Monument plant) including process waste lines and plant drainage.

4) Provide a plant layout similar to that provided for the Vada plant discharge plan.

5) Describe the disposition, volume, and materials of construction for the four surge tanks.

6) Is there a periodic inspection of the polyethylene pipeline to the Gillespie injection well? Is there a periodic inspection of the check valve? At what depth below the lease road is the pipeline to the Gillespie well? What measures were taken to prevent fractures in the pipeline due to heavy (mass) road traffic?

D. Information needed for the Vada discharge plan only:

1) Provide a schematic diagram of the waste water disposal system (similar to that submitted for the Monument plant) including process waste lines and drainage.

2) Is the area around the API tanks curbed? Is there a level indicator for the tanks?

3) Provide the quantity of effluent discharged and method of measurement.

4) Describe sump construction; provide drawings, if available.

5) Describe a contingency plan in the event of a tank shut-down (i.e. leaks, filled to capacity, etc.) or sump pump shut-down.

Your continued cooperation in this effort will greatly expedite the review process. If you have any questions, please do not hesitate to call me at (505) 827-5812.

Sincerely,

Philip L. Baca

PHILIP L. BACA
Environmental Engineering
Specialist

PLB/dp

cc: R. L. Stamets, Director
D. G. Boyer

STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

TONEY ANAYA
GOVERNOR

June 7, 1984

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-5800

Warren Petroleum Company
Box 1589
Tulsa, Oklahoma

Attention: Mr. L. T. Reed

Gentlemen:

In your letter of May 25, 1984, you state you will submit requested information on discharge plans for Monument, Saunders and Vada on or before December 30, 1984.

I believe a more appropriate schedule would be on or before September 30, 1984.

Yours very truly,

JOE D. RAMEY
Director

JDR/fd

Warren Petroleum Company

MANUFACTURING DEPARTMENT

P. O. Box 1589
Tulsa, Oklahoma 74102

May 25, 1984

Oil Conservation Division
Energy and Minerals Department
State of New Mexico
P. O. Box 2088
Santa Fe, New Mexico 87501

Attn: Mr. Joe E. Ramey, Director

Re: Discharge Plans for Monument, Saunders and Vada Gas Processing Plants

Dear Mr. Ramey:

This letter is to confirm our recent conversation with regard to the subject information.

Warren expects to submit further details for the Discharge Plans as you requested in your letters of February 23 and 24, 1984, on or before December 30, 1984. Sept. 30, 1984 submission date

If you have any questions or need further information, please contact Linda Johnson or me at (918) 560-4119.

Very truly yours,

L. T. Reed, Director
Environmental Affairs

LTR:am

STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

TONEY ANAYA
GOVERNOR

February 24, 1984

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-5800

Warren Petroleum Company
Box 1589
Tulsa, Oklahoma 74102

Attention: Mr. J. E. Moody

Gentlemen:

The formal waste discharge plan for your Vada Plant is insufficient in many areas and cannot be construed as a discharge plan.

Earlier this week I forwarded correspondence on your Monument and Saunders Plants and I would suggest that you forward the same type plan as I have requested for those plants.

Yours very truly,

JOE D. RAMEY
Director

JDR/fd

Warren Petroleum Company

MANUFACTURING DEPARTMENT

July 27, 1981

P. O. Box 1589
Tulsa, Oklahoma 74102

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

Attention: Mr. Joe D. Ramey
Division Director

Re: Discharge Plans
Vada Plant

Gentlemen:

Warren Petroleum Company, a division of Gulf Oil Corporation, is submitting the following formal waste water discharge plan for the Vada Gas Processing Plant located in Section 23, Township 105 and Range 33E, Lea County, New Mexico.

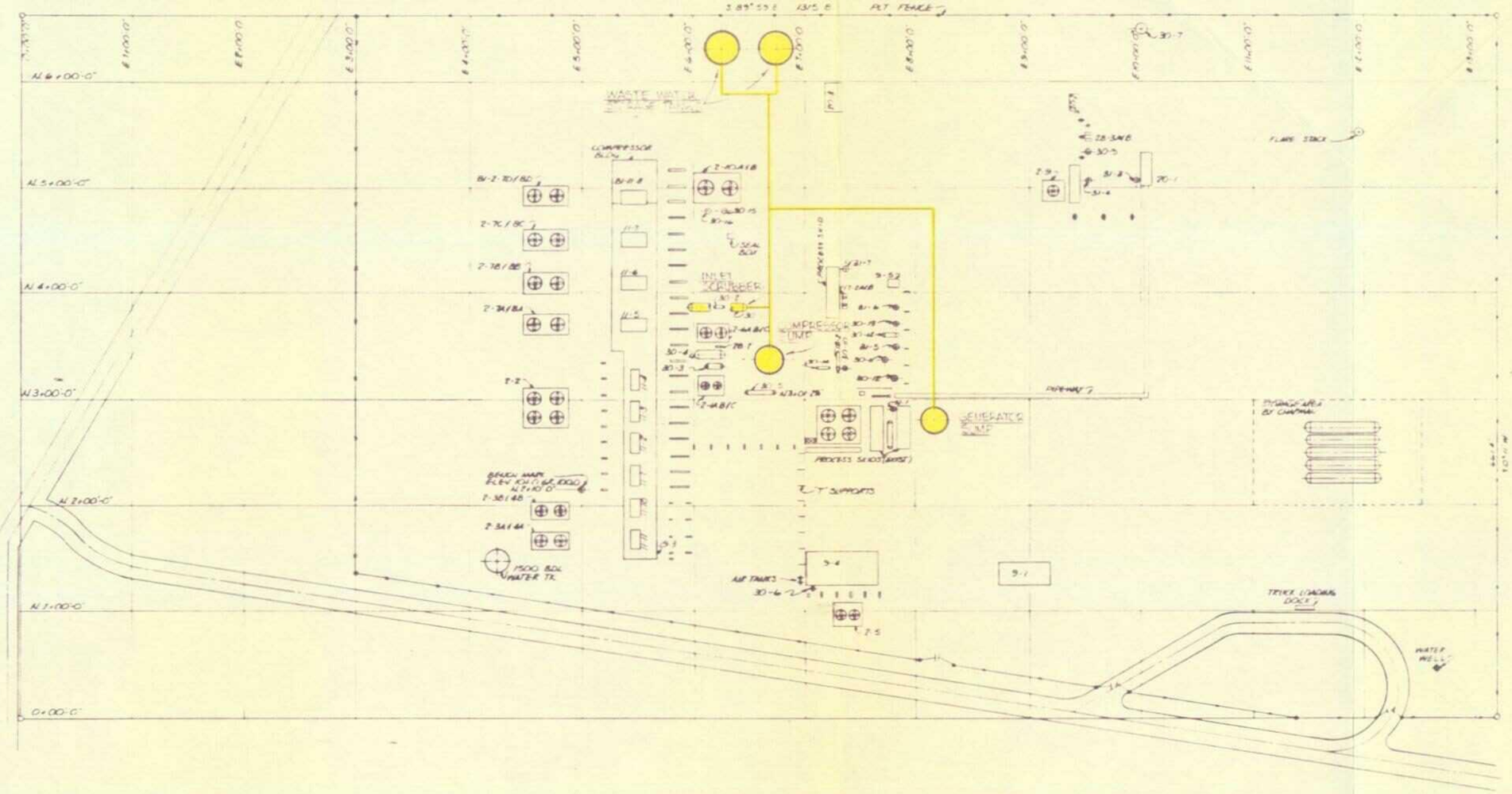
The liquid waste from the plant consists of general plant run-off into 2 different sumps and water from the inlet scrubber. This liquid waste is pumped into 2 metal API tanks located on the surface within the plant perimeter. A vapor recovery system is also included in each tank. The liquid waste is then accumulated and trucked out for separation by an independent firm. The firm sells the oil and disposes of the water in an injection well.

We hope this plan, with attached map, meets your approval. Should you have any questions or desire additional information, please call either Lynn Reed or me at (918) 560-4117.

Very truly yours,

Debra I. Johnson
for J. E. Moody, Manager
Environmental and Services

JEM:KCC:de
Attachment



MAJOR EQUIPMENT

AIR COMPRESSORS
1-1 STARTING AIR COMP
1-2 INST AIR COMP

COOLERS
2-1A,B,C GAS COOLERS (FOR BA-6)
2-2 J.W. COOLERS (FOR GAS COMP)
2-3 A&B J.W. COOLERS (FOR REFRIG COMP)
2-4 A&B L.O. COOLERS (FOR REFRIG COMP)
2-5 J.W. COOLER (FOR GEN ENGINE)
2-6 A,B,C GAS COOLERS (FOR GMW-8)
2-7 A,B,C,D J.W. COOLERS (FOR GMW-8)
2-8 A,B,C,D L.O. COOLERS (FOR GMW-8)
2-9 AMINE COOLER
2-10 A&B REGEN COOLERS

BUILDINGS
3-1 OFFICE & WAREHOUSE
3-2 GAS COMP BLDG
3-3 REFRIG COMP BLDG
3-4 GENERATOR BLDG
3-5 CONTROL BLDG

COMPRESSORS
11-1-4 BA-6 GAS COMPRESSORS
11-5-8 GMW-8 TF GAS COMPRESSORS
11-10/11 REFRIG COMPRESSORS

DEHYDRATORS
17-1 GLYCOL DEHYDRATOR UNIT (TEMPORARY)
17-2 A&B DEHYDRATOR

EXCHANGERS - SHELL & TUBE
18-1 L.O. COOLERS
18-2 CHILLER

HEATERS & FURNACES
20-1 DIRECT FIRED HEATER (BY CHAPMAN)
20-2 HOT OIL HEATER
20-3 REGEN GAS HEATER

GENERATORS
21-1-4 GENERATOR

PUMPS
28-1 J.W. CIR PUMP
28-2 COND PUMP
28-3 A&B HOT OIL PUMPS

TANKS & SCRUBBERS
30-1 1ST STAGE GAS SUC SCRUB
30-2 BLOWCASE - SKID UNIT
30-3 2ND STAGE GAS SUC SCRUB
30-4 3RD STAGE GAS SUC SCRUB
30-5 3RD STAGE GAS DISCH SCRUB
30-6 GEN J.W. SURGE TANK
30-7 COND STORAGE 250 BBL
30-8 GLYCOL SEP (TEMPORARY)
30-9 HOT OIL SURGE
30-10 INLET SCRUBBER
30-11 OUTLET SCRUBBER
30-12 AMINE SETTLER
30-13 FLASH TANK
30-14 FILTER
30-15 REGEN GAS SCRUB
30-16 RES SUC SCRUB

TOWERS
31-1 DEETHANIZER
31-2 GAS CONTACTOR
31-3 AMINE TREATER
31-4 AMINE TREATER
31-5 LIQUID CONTACTOR
31-6 GLYCOL CONTACTOR
31-7 DEMETHANIZER

GENERAL NOTES	GENERAL NOTES	DWG. NO.	REFERENCE DRAWING

NO.	REVISION	BY	DATE	CHK.	APPR.

NO.	REVISION	BY	DATE	CHK.	APPR.
0	REVISED & REDRAWN AS BUILT	JL	6-1-[illegible]		

ISSUE		
DATE	PRELIM	CONST

WARREN PETROLEUM COMPANY
TULSA, OKLAHOMA

PLANT LAYOUT

PLT 139 VADA
TATUM, N MEX.

DRAWN R.O. HALL	DATE 6-1-61	SCALE 1"=150'-0"	FILE
CHECKED	DATE	139-101-0	
APPROVED	DATE		

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 7, 1981

Mr. J. E. Moody or Lynn Reed
Warren Petroleum Company
P. O. Box 1589
Tulsa, Oklahoma 74102

Re: Request for Discharge Plans

Dear Mr. Moody:

Under provisions of the regulations of the Water Quality Control Commission you are hereby notified that the filing of discharge plans for Warren's Snyder Ranch Plant (Eddy County) and Vada Plant (23-10S-33E) is required. Discharge plans are defined in Section 1-101.1 of the regulations and a copy of the regulations is enclosed for your convenience.

These plans should cover all discharge of effluent at the plant sites or adjacent to the plant sites. Section 3-106A. of the regulations requires submittal of the discharge plans within 120 days of receipt of this notice unless an extension of this time period is sought and approved.

The discharge plans 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
cc: Oil Conservation Division - Hobbs
Warren Petroleum Co., P. O. Box 905, Tatum, N. M. 88267

Warren Petroleum Company

MANUFACTURING DEPARTMENT

July 27, 1981

P. O. Box 1589
Tulsa, Oklahoma 74102

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

Attention: Mr. Joe D. Ramey
Division Director

Re: Discharge Plans
Snyder Ranch Plant

Gentlemen:

Warren Petroleum Company, a division of Gulf Oil Corporation, is submitting the following formal waste water discharge plan for the Snyder Ranch Gas Processing Plant in Section 15, Township 19S, Range 31E in Eddy County, New Mexico.

The liquid waste in the plant consists of general plant run-off, condensate from the inlet gas separator, and water from the compressor interstage scrubber. The liquid waste is piped by gravity flow into a metal tank which is located on the surface within the plant perimeter, where it is accumulated and trucked out for separation by an independent firm. The firm sells the oil and disposes of the water in an injection well. The accumulation of liquid waste the firm separates amounts to approximately 300 barrels per year.

We hope this plan, with attached map, meets your approval. Should you have any questions or desire additional information, please call either Lynn Reed or me at (918) 560-4117.

Very truly yours,

Debra J. Johnson

for J. E. Moody, Manager
Environmental and Services

JEM:KCC:de
Attachment

T-19-S, R-31-E
EDDY COUNTY, NEW MEXICO

LOCATION MAP
SCALE 1"= 200'

PLANT NORTH

WATER TANK

INTERSTAGE SCRUBBER

INLET SCRUBBER

COMP. BUILD.

EXIST. LEASE ROAD

N 5+00.00
N 4+00'-0"
N 3+00'-0"
N 2+00'-0"
N 1+00'-0"
W 4+86.85'
W 4+00'-0"
W 3+00'-0"
W 2+00'-0"
W 1+00'-0"
E 0+00'
E 1+00'-0"
E 2+00'-0"
E 3+00'-0"
E 3+34.90'
N-S 0+00'
E-W 0+00

GENERAL NOTES

GENERAL NOTES

DWG. NO.

REFERENCE DRAWINGS

REVISION

REVISION

WARREN PETROLEUM COMPANY

EQUIPMENT LOCATION PLAN

SNYDER RANCH PLT. ZIA EDDY CO. NEW MEXICO

DRAWN DH DATE 7-91

CHECKED

APPROVED

214 - 1001 - P

Info. Needed For Vada Plant

(1) Waste water chemical analysis same as for Monument.

(2) Question the ability to have 100% vaporization of condensate at ambient conditions

(3) The following questions pertain to Part II Alternate A of the Spill Prevention and Countermeasure Plan in App. C of the D.P.

(a) How is the buried tank for the generator pump checked for leaks? Please comment on the possibility of checking for internal corrosion in the scrubber oil tanks (e.g., ultrasonic method) and generator pump.

(b) In Section C.1 the corrosion protection methods are described, have info. sent similar to Monument plant.

(c) Section D.2 If complete vaporization can't be shown please comment on methods to prevent spills during condensate loading to a tanker truck.

(d) ~~Section E.5 ask about locking certain valves such as valves for condensate and scrubber oil tanks.~~

(4) In your wastewater system schematic included in App. H, does the design for the open drains at the scrubbers (#8 on sketch) include provisions to prevent backflow onto the ground should a flow surge or plug-up occur at the Main plant sump (item #7 on the sketch)? What is the pumping capacity of the main plant sump pump? Does the back up pump have the same capacity?

(5) Does any sludge accumulate in the sumps or scrubber oil tanks? If so, how is this removed and where is it disposed of?