GW - 33

GENERAL CORRESPONDENCE

YEAR(S):

2007 - 1996

ANADARKO PETROLEUM CORPORATION

TEL. 832/ 636-1000
P.O. BOX 1330 • HOUSTON, TEXAS 77251-1330

March 15, 2007

New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505
Attn: Leonard Lowe

Re: Discharge Plan GW-033
San Juan Gas Plant

Dear Mr. Lowe:

Please find enclosed an affidavit and a copy of the public notice that was published in the Farmington Daily Times on February 25, 2007 for the subject facility. Should you have any questions or need additional information, please feel free to contact me at kent.weissling@anadarko.com or at 832-636-2368.

Sincerely,

Kent Weissling
Sr. Staff Environmental & Regulatory Analyst

Enclosure

AFFIDAVIT OF PUBLICATION

Ad No. 54703

STATE OF NEW MEXICO
County of San Juan:

ROBIN ALLISON, being duly sworn says: That she is the CLASSIFIED MANAGER of THE DAILY TIMES, a daily newspaper of general circulation published in English at Farmington, said county and state, and that the hereto attached Legal Notice was published in a regular and entire issue of the said DAILY TIMES, a daily newspaper duly qualified for the purpose within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico for publication and appeared in the Internet at The Daily Times web site on the following day(s):

Sunday February 25, 2007

And the cost of the publication is $459.60

Robin Allison

ON 3/2/07 ROBIN ALLISON appeared before me, whom I know personally to be the person who signed the above document.

Wynell Corey

My Commission Expires November 17, 2008

COPY OF PUBLICATION

PUBLIC NOTICE

Western Gas Resources, Inc., 1099 18th Street, Suite 1200, Denver, CO 80202 has submitted a renewal application to the New Mexico Energy, Minerals and Natural Resources Department, Oil Conservation Division for the previously approved discharge plan (GW-033) for their San Juan River Gas Plant, located in Section 1, Township 29 North, Range 15 West, NMPM, San Juan County, New Mexico, approximately eight miles west of Farmington, New Mexico and 1.7 miles north of Kirtland, New Mexico.

Plant process wastewater is discharged to a double lined surface evaporation pond, designed with a primary liner leak detection system. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 10 feet, with a total dissolved solids concentration of approximately 4,500 mg/l. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

Any interested person or persons may obtain information; submit comments or request to be placed on a facility-specific mailing list for future notices by contacting Leonard Lowe at the New Mexico OCD at 1220 South St. Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3492. The OCD will accept comments and statements of interest regarding the renewal and will create a facility-specific mailing list for persons who wish to receive future notices.

Legal No. 54703, published in The Daily Times, Farm

AVISO PÚBLICO

Western Gas Resources, Inc., 1099 18th Street, Denver, CO 80202, ha presentado una solicitud de renovación al Departamento de Energía, Minerales y Recursos Naturales de Nuevo México, División Conservación de Petróleo, para el plan de descarga (GW-033) previamente aprobado para su Planta de Gas del Río San Juan, ubicada en la Sección 1, Municipio 29, Range 15 West, NMPM, Condado de San Juan, Nuevo México, aproximadamente ocho millas al oeste de Farmington, Nuevo México, y 1.7 millas al norte de Kirtland, Nuevo México.

El agua desechada del proceso de la planta se descarga a una charca de evaporación con doble superficie de recubrimiento, diseñada con un sistema de detección de fuga en el recubrimiento principal. El agua subterránea con más probabilidad de ser afectada por un derrame, fuga o descarga accidental está a una profundidad de aproximadamente 10 pies, con una concentración total de sólidos disueltos de aproximadamente 4,500 mg/l. El plan de descarga resuelve cómo se manejarán, guardarán y desecharán los productos y desechos del campo petrolífero, incluyendo cómo se manejarán los derrames, fugas y otras descargas accidentales a la superficie para proteger el agua dulce.

Cualquier persona o grupos interesados pueden obtener información, presentar comentarios o solicitar ser colocados en una lista de correo específica de la facilidad para futuros avisos llamando a Leonard Lowe al OCD de Nuevo México en 1220 South St. Francis Drive, Santa Fe, Nuevo México 87505, teléfono (505) 476-3492. El OCD aceptará comentarios y declaraciones de interés sobre la renovación y creará una lista de correo específica de la facilidad para personas que quieran recibir avisos futuros.

ıington, New Mexico on Sunday, February 25, 2007.

THE DAILY TIMES
FARMINGTON, NEW MEXICO
THE FOUR CORNERS INFORMATION LEADER

PO Box 450 Farmington, NM 87499

2007 MAR 7 AM 11 56

Date: 02/22/07

OIL CONSERVATION DIVISION

OIL CONSERVATION DIVISIO
1220 SOUTH ST. FRANCIS DRIVE
SANTA FE, NM 87505
(505) 476-3440

Ad#	Publication	Class	Start	Stop	Times	AS/400 Acct
1000610129	FARMINGTO	0152 - Legal Notices	02/15/2007	02/15/2007	1	781442
1000610129	FARMINGTO	0152 - Legal Notices	02/15/2007	02/15/2007	1	781442

Total Cost:	$194.48
Payment:	$0.00
Balance Due:	$194.48

TEXT:

NOTICE OF PUBLICATIONSTATE OF NEW MEXICOENERGY, MINERALS AND NAT

Please include Ad number on your payment.

AFFIDAVIT OF PUBLICATION

Ad No. 54653

STATE OF NEW MEXICO
County of San Juan:

ROBIN ALLISON, being duly sworn says: That she is the CLASSIFIED MANAGER of THE DAILY TIMES, a daily newspaper of general circulation published in English at Farmington, said county and state, and that the hereto attached Legal Notice was published in a regular and entire issue of the said DAILY TIMES, a daily newspaper duly qualified for the purpose within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico for publication and appeared in the Internet at The Daily Times web site on the following day(s):

Thursday, February 15, 2007

And the cost of the publication is $194.48

Robin Allen

ON 3/2/07 ROBIN ALLISON appeared before me, whom I know personally to be the person who signed the above document.

Wynell Corey

My Commission Expires Nov 19, 2008

COPY OF PUBLICATION

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 (20.6.2.3106 NMAC), the following discharge permit application(s) has been submitted to the Director of the New Mexico Oil Conservation Division ("NMOCD"), 1220 S. Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW-033) Western Gas Resources, Inc. 1099 18th Street, Suite 1200, Denver, CO 80202 has submitted a renewal application for the previously approved discharge plan for their San Juan River Gas Plant, located in Section 1, Township 29 North, Range 15 West, NMPM, San Juan County, New Mexico, approximately eight miles west of Farmington, New Mexico and 1.7 miles north of Kirtland, New Mexico. Plant process wastewater is discharged to a double lined surface evaporation pond, designated with a primary liner leak detection system. Groundwater most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 10 feet, with a total dissolved solids concentration of approximately 4,500 mg/l. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

The NMOCD has determined that the application is administratively complete and has prepared a draft permit. The NMOCD will accept comments and statements of interest regarding this application and will create a facility-specific mailing list for persons who wish to re ceive future notices. Persons interested in obtaining further informa tion, submitting comments or requesting to be on a facility-specific mailing list for future notices may contact the Environmental Bureau Chief of the Oil Conservation Division at the address given above. The administrative completeness determination and draft permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday, or may also be viewed at the NMOCD web site http://www.emnrd.state.nm.us/ocd/. Persons interested in ob taining a copy of the application and draft permit may contact the NMOCD at the address given above. Prior to ruling on any proposed discharge permit or major modification, the Director shall allow a pe riod of at least thirty (30) days after the date of publication of this no tice, during which interested persons may submit comments or request that NMOCD hold a public hearing. 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 that there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed permit based on information available, including all comments received. If a public hearing is held, the director will ap prove or disapprove the proposed permit based on information in the permit application and information submitted at the hearing.

Para obtener más información sobre esta solicitud en espan?ol, sir vase comunicarse por favor: New Mexico Energy, Minerals and Natu ral Resources Department (Depto. Del Energia, Minerals y Recursos Naturales de Nuevo México), Oil Conservation Division (Depto. Con servacion Del Petróleo), 1220 South St. Francis Drive, Santa Fe, New México (Contacto: Dorothy Phillips, 505-476-3461)

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 12th day of February 2007.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
SEAL Mark Fesmire, Director

Legal No. 54653, published in The Daily Times, Farmington, New Mexico on Thursday, February 15, 2007

THE SANTA FE
NEW MEXICAN
Founded 1849

RECEIVED

FEB 2 3 2007

Oil Conservation Division
1220 S. St. Francis Drive
Santa Fe, NM 87505

NM EMNRD OIL CONSERVATION
ATTN: Leonard Lowe
1220 S ST FRANCIS DR
SANTA FE NM 87505

ALTERNATE ACCOUNT: 56689
AD NUMBER: 00203155 ACCOUNT: 00002212
LEGAL NO: 80410 P.O. #: 52100-00044

305 LINES 1 TIME(S)	170.80
AFFIDAVIT:	6.00
TAX:	13.48
TOTAL:	190.28

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, R. Lara, 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 # 80410 a copy of which is hereto attached was published in said newspaper 1 day(s) between 02/16/2007 and 02/16/2007 and that the notice was published in the newspaper proper and not in any supplement; the first date of publication being on the 16th day of February, 2007 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/ Ramona Lara
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 16th day of February, 2007

Notary Diana M Lobato

Commission Expires: 2-5-09

NOTICE OF PUBLICATION

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

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The NMOCD has determined that the application is administratively complete and has prepared a draft permit. The NMOCD will accept comments and statements of interest regarding this application and will create a facility-specific mailing list for persons who wish to receive future notices. Persons interested in obtaining further information, submitting comments or requesting to be on a facility-specific mailing list for future notices may contact the Environmental Bureau Chief of the Oil Conservation Division at the address given above. The administrative completeness determination and draft permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday, or may also be viewed at the NMOCD web site http://www.emnrd.state.nm.us/ocd/. Persons interested in obtaining a copy of the application and draft permit may contact the NMOCD at the address given above. Prior to ruling on any proposed discharge permit or major modification, the Director shall allow a period of at least thirty (30) days after the date of publication of this notice, during which interested persons may submit comments or request that NMOCD hold a public hearing. 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 that there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed permit based on information available, including all comments received. If a public hearing is held, the director will approve or disapprove the proposed permit based on information in the permit application and information submitted at the hearing.

Para obtener más información sobre esta solicitud en espanol, sirvase comunicarse por favor: New Mexico Energy, Minerals and Natural Resources Department (Depto. Del Energia, Minerals y Recursos Naturales de Nuevo México), Oil Conservation Division (Depto. Conservacio´n Del Petróleo), 1220 South St. Francis Drive, Santa Fe, New México (Contacto: Dorothy Phillips, 505-476-3461)

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 12th day of February 2007.

STATE OF
NEW MEXICO
OIL CONSERVATION
DIVISION

S E A L

Mark Fesmire,
Director

Legal #80410
Pub. Feb. 16, 2007

Lowe, Leonard, EMNRD

From: Stone, Ben, EMNRD
Sent: Tuesday, February 13, 2007 10:48 AM
To: Lowe, Leonard, EMNRD
Subject: RE: Administratively Complete

POSTED...

From: Lowe, Leonard, EMNRD
Sent: Monday, February 12, 2007 2:14 PM
To: Kent Weissling; Kent McEvers
Cc: Stone, Ben, EMNRD; Price, Wayne, EMNRD
Subject: Administratively Complete

Mr. Kent Weissling,

The Administratively Complete portion of the Discharge Plan renewal process is complete.

The following items are attached:

1. The **Administratively Complete** Letter.

2. The **Draft** Discharge Plan for the San Juan River Gas Plant. Noted in the plan are findings from the inspection Brandon and I performed last week.

3. A **draft permit** notice: as noted in the Admin. Complete Letter, a draft permit notice written from WGR should be reviewed by the OCD, prior to WGR publishing it. This is to ensure that the notice covers all points prior to publishing and eliminating any possible erroneous cost on WGR.

4. A flow chart on how the renewal Discharge Plan process "works". Note the attached WQCC public notice renewal requirements. Please contact me if you have questions.

An e-mail from Mr. Weissling will suffice as the addendum to the DP application pertaining to the hydrostatic testing on the facility. The information received from Mr. McEvers needs to be noted in the addendum. The following points will also need to be noted as stated in my previous e-mail.

- That all Hydrostatic testing will be conducted on-site ONLY, within the Discharge Plan boundary of the facility. Noted in the addendum that **No** hydrostatic water will be discharged on the ground, on or off site.

- An estimate of the amount of waste water you will be generating with these tests. And an estimate on the time frequency you will be conducting these tests. Also, if the tests are going to be conducted on old or new piping.

- Address the disposal of the hydrostatic water. Where you will be placing the water (i.e. pond, cooling towers, etc.)

Thank you,

llowe

Leonard Lowe

Environmental Engineer

OCD/EMNRD

PH: 505-476-3492

E-mail: leonard.lowe@state.nm.us

Lowe, Leonard, EMNRD

From: Weissling, Kent [Kent.Weissling@anadarko.com]
Sent: Tuesday, February 13, 2007 7:51 AM
To: Lowe, Leonard, EMNRD
Cc: McEvers, Kent
Subject: San Juan River Gas Plant hydrostatic testing

Leonard,

Here is the addendum to the discharge permit application (to be added to the end of section 2.4.1:

All below ground lines within the Discharge Plan boundary of the facility will be hydrostatically tested at least every five years. Tests will be performed on all old lines later in 2007 and should take approximately one month to complete. Approximately 9500 gallons of hydrostatic test water will be generated, with the entire content being sent to the double-lined evaporation pond located onsite. No hydrostatic test water will be discharged on the ground, on or off site. Any new lines installed at the plant will be tested at the next scheduled 5-year test date.

Let me know if this covers everything. Thanks for the help.

Kent Weissling
Sr. Staff Environmental & Regulatory Analyst
Anadarko Petroleum Corporation
(832) 636-2368

Please note my E-Mail Address has changed. Please update your contact list

Lowe, Leonard, EMNRD

From: Legals [legals@sfnewmexican.com]
Sent: Monday, February 12, 2007 5:00 PM
To: Lowe, Leonard, EMNRD
Subject: Re: Public Notice Request

I have scheduled this ad to publish on February 16th.
Thank you,

-- Ramona L. Lara
Santa Fe New Mexican
Legal Advertising
Direct (505) 986-3071
Fax (505) 820-1635

On 2/12/07 2:41 PM, "Lowe, Leonard, EMNRD" <Leonard.Lowe@state.nm.us> wrote:

> Ladies,
>
> Re: Public Notice Publication for the **Farmington Daily Times**: Ms. Alethia Rothlisberger (PO# 52100- 0000000131)
>
> Public Notice Publication for the **Santa Fe New Mexican: Ms. Besty Perner (PO# 52100-0000000044)**
>
> Please publish the attached Public Notice in the classified notice section of your respective newspapers. The PO# for your respective newspapers are provided above. Please mail an affidavit of proof of publication for the public notice to my contact e-mail address provided below so I may begin the 30 day public notice process. Please contact me if you have questions.
>
> Thank you for your attention and have a nice day.
>
> llowe

Leonard Lowe
Environmental Engineer
Oil Conservation Division, EMNRD
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505
Phone: (505) 476-3492
Fax: (505) 476-3462
E-mail: leonard.lowe@state.nm.us <mailto:leonard.lowe@state.nm.us>

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD

Sent: Monday, February 12, 2007 2:44 PM

To: Thompson, Bruce C., DGF; Shendo, Benny, DIA; 'ddapr@nmda.nmsu.edu'; 'Linda_Rundell@nm.blm.gov'; 'sthompson@ago.state.nm.us'; 'r@rthicksconsult.com'; 'sricdon@earthlink.net'; 'nmparks@state.nm.us'; Dantonio, John, OSE; 'seligman@nmoga.org'; Martinez, Elysia, NMENV; 'lwa@lwasf.com'; 'lazarus@glorietageo.com'; Stone, Marissa, NMENV; 'ron.dutton@xcelenergy.com'; 'cgarcia@fs.fed.us'; 'jbarnett@barnettwater.com'; Bearzi, James, NMENV; 'mschulz@theitgroup.com'; 'bsg@garbhall.com'; 'jcc_crb@pacbell.net'; Olson, Bill, NMENV; 'claudette.horn@pnm.com'; 'ekendrick@montand.com'; 'ken@crihobbs.com'

Subject: NMOCD Public Notice Announcement

Attachments: WGR - DraftPermitNotice.DOC; WGR - Draft Discharge Plan draft.doc

Ladies and gentlemen,

Please note that the following has been submitted for Public Notice in the Santa Fe New Mexican and in the Farmington Daily Times.

Thank you,

llowe

Leonard Lowe
Environmental Engineer
Oil Conservation Division, EMNRD
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505
Phone: (505) 476-3492
Fax: (505) 476-3462
E-mail: leonard.lowe@state.nm.us

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Monday, February 12, 2007 2:42 PM
To: 'legals@sfnewmexican.com'; 'legals@daily-times.com'
Subject: Public Notice Request
Attachments: WGR - DraftPermitNotice.DOC

Ladies,

Re: Public Notice Publication for the **Farmington Daily Times**: Ms. Alethia Rothlisberger (PO# 52100- 0000000131)
Public Notice Publication for the **Santa Fe New Mexican**: Ms. Besty Perner (PO# 52100-0000000044)

Please publish the attached Public Notice in the classified notice section of your respective newspapers. The PO# for your respective newspapers are provided above. Please mail an affidavit of proof of publication for the public notice to my contact e-mail address provided below so I may begin the 30 day public notice process. Please contact me if you have questions.

Thank you for your attention and have a nice day.

llowe

Leonard Lowe
Environmental Engineer
Oil Conservation Division, EMNRD
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505
Phone: (505) 476-3492
Fax: (505) 476-3462
E-mail: leonard.lowe@state.nm.us

Lowe, Leonard, EMNRD

From: Weissling, Kent [Kent.Weissling@anadarko.com]
Sent: Monday, February 12, 2007 2:22 PM
To: Lowe, Leonard, EMNRD
Subject: FW: - Hydrostatic testing -

Leonard,

Do we need to test all of the lines listed below this year? In 2002, the OCD allowed us to test about half of them (see Kent's note below). Do we just test all the others (lines 5,6 & 7 this year or do we need to test them all?

From: McEvers, Kent [mailto:Kent.McEvers@anadarko.com]
Sent: Monday, February 12, 2007 12:46 PM
To: Lowe, Leonard, EMNRD; Weissling, Kent
Subject: RE: - Hydrostatic testing -

Let me try and answer the points that you raised Leonard.
I did an estimate of the gallons that would be used to hydrotest the lines.
1. The contact water to pond would be app. 2250 gallons.
2. Sump drain by operators room to contact water would be app. 900 gallons.
3. Compressor drain to contact water, app. 250 gallons.
4. Flare header, app. 2500 gallons.
5. The lab sink, boiler, storm drain app. 750 galllons
6. Filter, sump and boiler sump app. 750 gallons
7. Amine still to amine sump. App 600 gallons
8. Amine reflux lines. App 1500 gallons

Total estimated water used would be app. 9500 gallons. What was allowed last time by Denny Foust was that we could static test certain lines. 1,2,3,4 and 8 were all static tested in 2002.

The tests will be done on old piping over a month time span.

The water would all be taken to our evaporation pond here at the plant.

I hope this answers the questions. Kent, would you be including this on our renewal? Thanks....Kent

---

From: Lowe, Leonard, EMNRD [mailto:Leonard.Lowe@state.nm.us]
Sent: Thursday, February 08, 2007 11:58 AM
To: Weissling, Kent; McEvers, Kent
Subject: - Hydrostatic testing -

Kent,

I talked with Brad Jones and Wayne Price on the hydrostatic testing process you intend to do at your facility. They gave me the following direction.

We can put this in your renewal Discharge Plan application, so that you all will not have to submit an application for each hydrostatic test you will be conducting, ON THE FACILITY.

In order to do this an addendum needs to be written to the Discharge plan you have already submitted. This addendum needs to address and state the following:

- That all Hydrostatic testing will be conducted on-site ONLY, within the Discharge Plan boundary of the facility. Noted in the addendum that No hydrostatic water will be discharged on the ground, on or off site.

- An estimate of the amount of waste water you will be generating with these tests. And an estimate on the time frequency you will be conducting these tests. Also, if the tests are going to be conducted on old or new piping.

- Address the disposal of the hydrostatic water. Where you will be placing the water (i.e. pond, cooling towers, etc.)

If you have any questions. Brad Jones and I can conduct a conference call with you both.

Thank you for your attention.

llowe

Leonard Lowe
Environmental Engineer
OCD/EMNRD
1220 S. St. Francis Drive
Santa Fe, New Mexico 87505
Office: 505-476-3492
E-mail: leonard.lowe@state.nm.us

Please note my E-Mail Address has changed. Please update your contact list

---

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Monday, February 12, 2007 11:40 AM
To: Price, Wayne, EMNRD
Subject: FW: Lab waste question

WGR's response to their lab waste.

From: McEvers, Kent [mailto:Kent.McEvers@anadarko.com]
Sent: Monday, February 12, 2007 8:13 AM
To: Lowe, Leonard, EMNRD
Cc: Weissling, Kent
Subject: RE: Lab waste question

After we had the lab water tested we were allowed to put it back into the line that goes to the contact water which then goes to the lined pond and evaporates. The guys run water tests twice a week and we run our tutweiller tests for H2S 5 times per week. We use Iodine, sodium thiosulfate, a very small amount of sulfuric and hydrochloric acid to back titrate. We don't keep the records as the water is flushed to the lined contact water catch tank. Please let me know if this is the way we will continue to do this. Thanks...Kent

---

From: Lowe, Leonard, EMNRD [mailto:Leonard.Lowe@state.nm.us]
Sent: Friday, February 09, 2007 4:37 PM
To: McEvers, Kent
Subject: Lab waste question

Mr. Kent McEvers

Good afternoon,

Question concerning your lab waste.

According to the submitted application permit Ron LePlatt noted the volume of lab waste water generated (<= 1 quart/month).

When you dispose of the lab waste do you keep a record of the time this happens? i.e. dates.

I'm talking with Wayne on this issue.

Get back with me on this.

Thank you and have a good weekend.

llowe

Leonard Lowe
Environmental Engineer
OCD/EMNRD
PH: 505-476-3492
E-mail: leonard.lowe@state.nm.us

*Please note my E-Mail Address has changed. Please
update your contact list*

Lowe, Leonard, EMNRD

Subject: SAN JUAN RIVER GAS PLANT INSPECTION
Location: Kirtland N.M.

Start: Wed 2/7/2007 7:00 AM
End: Wed 2/7/2007 7:00 PM

Recurrence: (none)

Meeting Status: Meeting organizer

Required Attendees: Lowe, Leonard, EMNRD; Price, Wayne, EMNRD

Mr. Weissling,

We intend to be in the vicinity of Kirtland New Mexico on Wednesday, February 7th at 11:30 A.M. or so.

We hope to start the inspection at noon that day.

If we run into any problems prior to our appointment we will give Mr. Kent McEvers a call.

Thank you for your attention.

Leonard Lowe

Environmental Engineer

OCD/EMNRD

PH: 505-476-3492

E-mail: leonard.lowe@state.nm.us

UPDATE:
Wayne couldn't make this. Stuck in SE NM with Carl that day.

Glenn offered to go with me.

Brandon Powell from the Aztec office accompanied me on this inspection.

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Wednesday, January 17, 2007 8:29 AM
To: Weissling, Kent
Cc: 'LePlatt, Ron'
Subject: RE: Questions on submitted DP-033 application

Mr. Kent Weissling,

Good morning.

We, the OCD in Santa Fe, would like to perform an inspection of the San Juan River Gas Plant located in Kirtland New Mexico as part of the renewal discharge plan for Western Gas Resources DP - 033.

When would you be available to guide us through this inspection?

Get back with me on this.

Thank you,

Leonard Lowe
Environmental Engineer
OCD/EMNRD
PH: 505-476-3492
E-mail: leonard.lowe@state.nm.us

From: LePlatt, Ron [mailto:Ron.LePlatt@anadarko.com]
Sent: Tuesday, January 16, 2007 8:49 AM
To: Lowe, Leonard, EMNRD
Cc: Weissling, Kent; McEvers, Kent; Grygar, Bill; Dixon, John
Subject: RE: Questions on submitted DP-033 application

Leonard - Answers to your questions are provided below.

As we discussed, my last day here will be Friday, January 19th. Kent Weissling will assume responsibility for the Discharge Plan Renewal Application. Please coordinate your inspection of the facility with him. He can be reached at (832) 636-2368. Thanks.

Ron LePlatt
Western Gas Resources, Inc.
An Anadarko Company
(303) 252-6237
(303) 450-6960 (fax)

> -----Original Message-----
> **From:** Lowe, Leonard, EMNRD [mailto:Leonard.Lowe@state.nm.us]
> **Sent:** Thursday, January 11, 2007 3:45 PM
> **To:** LePlatt, Ron
> **Cc:** Grygar, Bill; Price, Wayne, EMNRD
> **Subject:** Questions on submitted DP-033 application

Mr. Ron LePlatt,

A few questions pertaining to the Admin complete portion of the San Juan River Gas Plant Discharge Plan GW-033.

1. Mr. Wayne Price last inspected the San Juan River Gas Plant on December 21st, 2001. He had noted the following issues and gave notification for compliance by December 29, 2002. These were noted in the Discharge Plan Approval Conditions, # 14. OCD Inspections. Have these items been addressed?

A. The refined product storage tanks located within the "A" basin should be positioned to prevent spillage outside of the containment.[Ron LePlatt] Tanks were repositioned within the basin, away from the basin wall.
B. The "B" basin drum storage area was noted to have empty drums stored improperly, and some drums contained unknown material or waste.[Ron LePlatt] Drums with materials have been properly labeled. Empty drums have been properly stacked.
C. North plant area where waste piles of used activated alumni, Mo-sieve and old cooling tower debris is presently being stored.[Ron LePlatt] Those waste piles were properly characterized and shipped off-site for disposal in 2002. However, WGR recently replaced the catalyst in the sulfur recovery unit. The spent catalyst is currently stored in the same area, pending off-site disposal.
D. North main plant inlet pigging station needs proper containment.[Ron LePlatt] Earth berms in this area have been re-configured and built to provide proper containment. The berms are shown in the SPCC Plan.
E. The TEG De-HY knock-out tank needs proper containment.[Ron LePlatt] A steel containment structure has been constructed.
F. The filter drain sump area.[Ron LePlatt] During the inspection it was noted that standing fluids were present in the area. WGR properly drains the filters before placing them in the area for storage, which prevents liquids from accumulating.
G. The shop pad drum storage area needs proper containment.[Ron LePlatt] Containment for drums in this area has been provided.
H. A hazardous waste determination per EPA-RCRA regulations shall be made before lab wastewater is disposed of into the evaporation pond. Records shall be maintained for analytical results, volumes disposed, dates, etc.[Ron LePlatt] The laboratory wastewater is generated by a titration procedure to determine the hydrogen sulfide content of inlet gas and acid gas from the amine treating process. It consists of iodine, water, sulfuric and/or hydrochloric acid. A TCLP analysis of the wastewater stream was last performed in 1996. WGR will collect another sample of the stream for TCLP analysis.

2. Section 2.4.2 Protection from Spills and Leaks (page 6)

Paragraph 6: You indicate storage of "cooling tower and boiler chemicals inside plant buildings...". Can you identify and quantify these chemicals?[Ron LePlatt] We use relatively small amounts of chemicals for treating water. We will provide a description and annual volumes of those chemicals in the near future.

These are the items we talked about this afternoon.

I will make the road (HWY 64 and CR 6500) corrections to your DP application.

Thank you for your attention.

Leonard Lowe
Environmental Engineer
OCD/EMNRD
PH: 505-476-3492
E-mail: leonard.lowe@state.nm.us

Please note my E-Mail Address has changed. Please update your contact list

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Lowe, Leonard, EMNRD

From: LePlatt, Ron [Ron.LePlatt@anadarko.com]
Sent: Thursday, January 11, 2007 9:54 AM
To: Lowe, Leonard, EMNRD
Cc: Dixon, John; Grygar, Bill
Subject: RE: Public notification

We will use The Daily Times, which is published in Farmington, New Mexico.

FYI - my last day with WGR (Anadarko) will be Friday, January 19. I'll be happy to provide additional information and assistance concerning the Discharge Plan until then. After the 19th, your new contact will be Bill Grygar, who is located in Woodlands, Texas. His contact information is:

(832) 636-2656
bill.grygar@anadarko.com

Thanks.

Ron LePlatt
Western Gas Resources, Inc.
An Anadarko Company
(303) 252-6237
(303) 450-6960 (fax)

> -----Original Message-----
> **From:** Lowe, Leonard, EMNRD [mailto:Leonard.Lowe@state.nm.us]
> **Sent:** Thursday, January 11, 2007 9:11 AM
> **To:** LePlatt, Ron
> **Subject:** Public notification
>
> Mr. Ron LePlatt,
>
> Thank you for your e-mail.
>
> I have one question for you.
>
> What newspaper do you intend on using to distribute public notice for the San Juan River Gas plant?
>
> I will submit more inquiries pertaining to the technically complete portion of this process once this first hurdle is accomplished.
>
> Thank you for your attention.
>
> Leonard Lowe
> Environmental Engineer
> OCD/EMNRD
> PH: 505-476-3492
> E-mail: leonard.lowe@state.nm.us

Please note my E-Mail Address has changed. Please update your contact list

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Cooling Tower.
100 gallon @ yr.

GE Betz

GE Betz, Inc.
4636 Somerton Road
Trevose, PA 19053
Business telephone: (215) 355-3300

Material Safety Data Sheet

Issue Date: 04-FEB-2003

EMERGENCY TELEPHONE (Health/Accident): (800) 877-1940

1 PRODUCT IDENTIFICATION

PRODUCT NAME:

CONTINUUM AT220

PRODUCT APPLICATION AREA:

CORROSION INHIBITOR/DISPERSANT.

2 COMPOSITION / INFORMATION ON INGREDIENTS

Information for specific product ingredients as required by the U.S. OSHA HAZARD COMMUNICATION STANDARD is listed. Refer to additional sections of this MSDS for our assessment of the potential hazards of this formulation.

HAZARDOUS INGREDIENTS:

CAS#	CHEMICAL NAME
3794-83-0	PHOSPHONIC ACID, (HYDROXYETHYLIDENE)BIS-, TETRASODIUM SALT Irritant (eyes)
64665-57-2	BENZOTRIAZOLE,METHYL,SODIUM SALT (SODIUM TOLYLTRIAZOLE),(TTA) Corrosive (eyes and skin); toxic (by ingestion)
1310-73-2	SODIUM HYDROXIDE (CAUSTIC SODA) Corrosive; toxic (by ingestion)

No component is considered to be a carcinogen by the National Toxicology Program, the International Agency for Research on Cancer, or the Occupational Safety and Health Administration at OSHA thresholds for carcinogens.

3 HAZARDS IDENTIFICATION

****

EMERGENCY OVERVIEW

WARNING

May cause moderate irritation to the skin. Severe irritant to the eyes, possibly corrosive. Mists/aerosols may cause irritation to upper respiratory tract.

DOT hazard: Corrosive to aluminum, RQ
Emergency Response Guide #154
Odor: Mild; Appearance: Yellow, Liquid

Fire fighters should wear positive pressure self-contained breathing apparatus(full face-piece type). Proper fire-extinguishing media: dry chemical, carbon dioxide, foam or water

****

POTENTIAL HEALTH EFFECTS

ACUTE SKIN EFFECTS:
Primary route of exposure; May cause moderate irritation to the skin.

ACUTE EYE EFFECTS:
Severe irritant to the eyes, possibly corrosive.

ACUTE RESPIRATORY EFFECTS:
Mists/aerosols may cause irritation to upper respiratory tract.

INGESTION EFFECTS:
May cause gastrointestinal irritation.

TARGET ORGANS:
No evidence of potential chronic effects.

MEDICAL CONDITIONS AGGRAVATED:
Not known.

SYMPTOMS OF EXPOSURE:
May cause redness or itching of skin, irritation, and/or tearing of eyes (direct contact).

4 FIRST AID MEASURES

SKIN CONTACT:
Wash thoroughly with soap and water. Remove contaminated clothing. Thoroughly wash clothing before reuse. Get medical attention if irritation develops or persists.

EYE CONTACT:
URGENT! Immediately flush eyes with plenty of low-pressure water for at least 20 minutes while removing contact lenses. Hold eyelids apart. Get immediate medical attention.

INHALATION:
If nasal, throat or lung irritation develops - remove to fresh air and get medical attention.

INGESTION:
Do not feed anything by mouth to an unconscious or convulsive victim. Do not induce vomiting. Immediately contact physician. Dilute contents of stomach using 3-4 glasses milk or water.

NOTES TO PHYSICIANS:
No special instructions

5 FIRE FIGHTING MEASURES

FIRE FIGHTING INSTRUCTIONS:
Fire fighters should wear positive pressure self-contained breathing apparatus (full face-piece type).
EXTINGUISHING MEDIA:
dry chemical, carbon dioxide, foam or water
HAZARDOUS DECOMPOSITION PRODUCTS:
Thermal decomposition (destructive fires) yields elemental oxides.
FLASH POINT:
> 200F > 93C SETA(CC)
MISCELLANEOUS:
Corrosive to aluminum, RQ
UN3266;Emergency Response Guide #154

6 ACCIDENTAL RELEASE MEASURES

PROTECTION AND SPILL CONTAINMENT:
Ventilate area. Use specified protective equipment. Contain and absorb on absorbent material. Place in waste disposal container. Flush area with water. Wet area may be slippery. Spread sand/grit.
DISPOSAL INSTRUCTIONS:
Water contaminated with this product may be sent to a sanitary sewer treatment facility,in accordance with any local agreement,a permitted waste treatment facility or discharged under a permit. Product as is - Incinerate or land dispose in an approved landfill.

7 HANDLING & STORAGE

HANDLING:
Alkaline. Do not mix with acidic material.
STORAGE:
Keep containers closed when not in use. Protect from freezing.

8 EXPOSURE CONTROLS / PERSONAL PROTECTION

EXPOSURE LIMITS

CHEMICAL NAME

PHOSPHONIC ACID, (HYDROXYETHYLIDENE)BIS-, TETRASODIUM SALT
PEL (OSHA): NOT DETERMINED
TLV (ACGIH): NOT DETERMINED

BENZOTRIAZOLE,METHYL,SODIUM SALT (SODIUM TOLYLTRIAZOLE),(TTA)
PEL (OSHA): NOT DETERMINED
TLV (ACGIH): NOT DETERMINED

SODIUM HYDROXIDE (CAUSTIC SODA)
PEL (OSHA): 2 MG/M3
TLV (ACGIH): 2 MG/M3(CEILING)

ENGINEERING CONTROLS:
Adequate ventilation to maintain air contaminants below exposure limits.
PERSONAL PROTECTIVE EQUIPMENT:
Use protective equipment in accordance with 29CFR 1910 Subpart I
RESPIRATORY PROTECTION:
A RESPIRATORY PROTECTION PROGRAM THAT MEETS OSHA'S 29 CFR 1910.134 AND ANSI Z88.2 REQUIREMENTS MUST BE FOLLOWED WHENEVER WORKPLACE CONDITIONS WARRANT A RESPIRATOR'S USE.
USE AIR PURIFYING RESPIRATORS WITHIN USE LIMITATIONS ASSOCIATED WITH THE EQUIPMENT OR ELSE USE SUPPLIED AIR-RESPIRATORS.

If air-purifying respirator use is appropriate, use a respirator with dust/mist filters.

SKIN PROTECTION:

neoprene gloves-- Wash off after each use. Replace as necessary.

EYE PROTECTION:

splash proof chemical goggles

9 PHYSICAL & CHEMICAL PROPERTIES

Specific Grav.(70F,21C)	1.245	Vapor Pressure (mmHG)	~ 18.0
Freeze Point (F)	18	Vapor Density (air=1)	< 1.00
Freeze Point (C)	-8		
Viscosity(cps 70F,21C)	48	% Solubility (water)	100.0

Odor		Mild
Appearance		Yellow
Physical State		Liquid
Flash Point	SETA(CC)	> 200F > 93C
pH As Is (approx.)		12.8
Evaporation Rate (Ether=1)		< 1.00

NA = not applicable ND = not determined

10 STABILITY & REACTIVITY

STABILITY:

Stable under normal storage conditions.

HAZARDOUS POLYMERIZATION:

Will not occur.

INCOMPATIBILITIES:

May react with strong oxidizers.

DECOMPOSITION PRODUCTS:

Thermal decomposition (destructive fires) yields elemental oxides.

INTERNAL PUMPOUT/CLEANOUT CATEGORIES:

"B"

11 TOXICOLOGICAL INFORMATION

Oral LD50 RAT:	3,775 mg/kg
NOTE - Estimated value	
Dermal LD50 RABBIT:	>5,000 mg/kg
NOTE - Estimated value	

12 ECOLOGICAL INFORMATION

AQUATIC TOXICOLOGY

Bluegill Sunfish 48 Hour Static Screen
0% Mortality= 1000 mg/L

Daphnia magna 48 Hour Static Renewal Bioassay (pH adjusted)
LC50= 1520; No Effect Level= 313 mg/L

Fathead Minnow 7 Day Chronic Bioassay (pH adjusted)
Survival NOEL= 125; Survival LOEL= 250 mg/L

Fathead Minnow 96 Hour Static Renewal Bioassay (pH adjusted)
No Effect Level= 625; LC50= 1250 mg/L

Rainbow Trout 96 Hour Static Renewal Bioassay (pH adjusted)
LC50= 442; No Effect Level= 156 mg/L

BIODEGRADATION

BOD-28 (mg/g): 20
BOD-5 (mg/g): 6
COD (mg/g): 293
TOC (mg/g): 106

13 DISPOSAL CONSIDERATIONS

If this undiluted product is discarded as a waste, the US RCRA hazardous waste identification number is :
D002=Corrosive(pH).

Please be advised; however, that state and local requirements for waste disposal may be more restrictive or otherwise different from federal regulations. Consult state and local regulations regarding the proper disposal of this material.

14 TRANSPORT INFORMATION

DOT HAZARD:	Corrosive to aluminum, RQ
UN / NA NUMBER:	UN3266
DOT EMERGENCY RESPONSE GUIDE #:	154

15 REGULATORY INFORMATION

TSCA:
All components of this product are listed in the TSCA inventory.
CERCLA AND/OR SARA REPORTABLE QUANTITY (RQ):
2,922 gallons due to SODIUM HYDROXIDE (CAUSTIC SODA);
USDA FEDERALLY INSPECTED MEAT AND POULTRY PLANTS:
SEC.G5,G7
SARA SECTION 312 HAZARD CLASS:
Immediate(acute)
SARA SECTION 302 CHEMICALS:
No regulated constituent present at OSHA thresholds
SARA SECTION 313 CHEMICALS:
No regulated constituent present at OSHA thresholds

CALIFORNIA REGULATORY INFORMATION

CALIFORNIA SAFE DRINKING WATER AND TOXIC ENFORCEMENT ACT (PROPOSITION 65) CHEMICALS PRESENT:

No regulated constituent present at OSHA thresholds

MICHIGAN REGULATORY INFORMATION

No regulated constituent present at OSHA thresholds

16 OTHER INFORMATION

NFPA/HMIS		CODE TRANSLATION
Health	2	Moderate Hazard
Fire	1	Slight Hazard
Reactivity	0	Minimal Hazard
Special	ALK	pH above 12.0
(1) Protective Equipment	B	Goggles,Gloves

(1) refer to section 8 of MSDS for additional protective equipment recommendations.

55 gal stored. 50 gal yr.

Continental Products of Texas

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

Corrate 28A

SECTION I - IDENTIFICATION

TRADE NAME.....	Corrate 28A
REVISED DATE.....	December 12, 1997
CHEMICAL NAME.....	Aqueous Mixture
CAS NUMBER.....	Not Appropriate
OSHA HAZARD CLASS.....	Health Hazard - Eye hazard, Skin hazard, Nervous System toxin, Kidney toxin, Blood toxin, Liver toxin Sensitizer. Physical Hazard - Corrosive
EMERGENCY PHONE NUMBER...	1-800-592-4684 OR CHEMTREC 1-800-424-9300

SECTION II - HAZARDOUS INGREDIENTS

HAZARDOUS COMPONENTS	HAZARDOUS %	HAZARDOUS COMPONENT DATA
Sodium Hydroxide (CAS# 1310-73-2)	Conf.	OSHA (PEL): TWA = 2 mg/m3. ACGIH (TLV ceiling = 2 mg/m3.
Ethylene Glycol (CAS# 107-21-1)	Conf.	ACGIH (TLV): ceiling = 50 ppm, 125 mg/m3.
Trade Secrete Component	Conf.	ACGIH (TLV): TWA = 5 mg/m3.

SECTION III - PHYSICAL DATA

BOILING POINT.....	221 Deg F
VAPOR PRESSURE (mm Hg)...	27
SOLUBILITY IN H2O.....	Completely soluble
APPEARANCE/ODOR.....	Red colored liquid / Odorless
SPECIFIC GRAVITY (H2O=1).	1.2
VOLATILITY/VOL(%).....	60
PH OF SOLUTION.....	11.0 to 13.0

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

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

HYDROCHEM

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Corrate 28A

SECTION V - HEALTH HAZARD DATA

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

OVER EXPOSURE EFFECTS	INHALATION:	SKIN AND EYES	INGESTION:
	Severe Nasal and Respiratory damage.	Severe Eye and Skin burns, possible ulceration.	Nausea, Vomiting, Cramps, Throat and Stomach damage.

MEDICAL CONDITIONS AGGRAVATED BY EXPOSURE.. None are known.

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

FIRST AID PROCEDURES..... INHALATION: (Aspiration) Move victim to fresh air. If victim has stopped breathing, give artificial respiration. Get immediate medical attention.
INGESTION: Give large amounts of water and induce vomiting. Get immediate medical attention.
EYE CONTACT: Wash eyes with large amounts of water for 15 minutes. Get medical attention.
SKIN CONTACT: Wash skin with soap and water. If irritations persists, get medical attention. Wash contaminated clothing before reuse.

SECTION VI - REACTIVITY DATA

CHEMICAL STABILITY..... Stable
CONDITIONS TO AVOID..... Not Applicable
INCOMPATIBLE MATERIALS... Strong Acids
DECOMPOSITION PRODUCTS... Oxides of Carbon and Nitrogen
HAZARDOUS POLYMERIZATION. Will not occur

HYDROCHEM

Continental Products of Texas

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

Corrate 28A

SECTION VII - SPILL OR LEAK PROCEDURE

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

SECTION VIII - SPECIAL PROTECTION

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

SECTION IX - SPECIAL PRECAUTIONS

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

SECTION X - ADDITIONAL DATA

EPA HAZARD CATEGORY.....	Immediate (acute) health hazard - Corrosive, Toxic, Irritant, Sensitizer
DOT LABEL REQUIRED.....	Corrosive
CERCLA REPORTABLE QUANTITY OF MIXTURE.....	3,667 gls

SARA TITLE III DATA

THRESHOLD PLANNING QUANTITY.....	Not Applicable
OFFSITE RELEASE RQ.....	3,667 gls

SECTION 313 TOXIC COMPONENT/S

COMPONENT CHEMICAL NAME	AMOUNT IN MIXTURE
Sodium Hydroxide (CAS# 1310-73-2)	< 3%
Ethylene Glycol (CAS# 107-21-1)	< 10%

HYDROCHEM

Continental Products of Texas

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

Corrate 28A

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

55 gal. stored.
50 gal yr.

MATERIAL SAFETY DATA

Delta Water Laboratories

Effective Date: January 20, 2003
Supersedes: April 29, 1999

1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

PRODUCT NAME: **Delta J-143**

Delta Water Laboratories
4206 MLK Blvd.
Lubbock, TX 79404

EMERGENCY: (806) 763-4158
TEXAS: (800) 692-4512
24-hour emergency Chem-Tel, Inc: (800) 255-3924

2. COMPOSITION/INFORMATION ON INGREDIENTS

OSHA REGULATED COMPONENTS

COMPONENT	%	OSHA PEL	ACGIH TLV	OTHER LIMIT	HAZARD	CAS NO.
Sodium Sulfite	10-20	None	None	None	Irritant	7757-83-7
Sodium Bisulfite	2-10	None	5	None	Irritant	7631-90-5

3. HAZARDS IDENTIFICATION

EMERGENCY OVERVIEW

APPEARANCE AND ODOR: Clear water white liquid. Odorless

STATEMENTS OF HAZARD: Irritant.

POTENTIAL HEALTH EFFECTS

ROUTES OF EXPOSURE: Skin or eye contact.

EYE CONTACT: Solutions may irritate or burn.

SKIN CONTACT: No irritation is likely after brief contact but may be irritating after prolonged contact.

INGESTION: Ingestion may irritate gastrointestinal tract. Estimated to be moderately toxic. May cause allergic reaction in some asthmatics and sulfite sensitive individuals. Large doses may cause violent colic and diarrhea, circulatory disturbances, central nervous system depression and even death.

INHALATION: Inhalation of product or mist may irritate respiratory tract. Contact with acids liberates irritating and potentially fatal sulfur dioxide gas.

4. FIRST AID MEASURES

EYES: In case of eye contact, wash eyes immediately and continuously for 15 minutes. Call for medical assistance immediately.

SKIN: Immediately flush skin with lots of running water for 15 minutes. Wash contaminated clothing before reuse. Get medical attention if irritation persists after washing.

INGESTION: Immediately give two glasses of water and induce vomiting. Get immediate medical attention. Do not give anything by mouth to an unconscious or convulsing person.

INHALATION: Remove to fresh air. Give artificial respiration if not breathing. Get immediate medical attention.

5. FIRE FIGHTING MEASURES

FLAMMABLE PROPERTIES

FLASH POINT: None.

METHOD USED: Not Applicable.

FLAMMABLE LIMITS: Not Applicable.

EXTINGUISHING MEDIA: Not Combustible.

FIRE AND EXPLOSION HAZARDS: Not Applicable.

FIRE FIGHTING EQUIPMENT: Wear self-contained (positive-pressure if available) breathing apparatus and full protective clothing.

6. ACCIDENTAL RELEASE MEASURES

ACTION TO TAKE: Wear acid-resistant slicker suit; also rubber boots, rubber gloves, and a self-contained breathing apparatus in the pressure demand mode. If the spill is small, a full face piece air purifying cartridge respirator equipped for acid gases may be used. For small spills or drips, mop or wipe up and dispose of in DOT-approved waste containers. For large spills, contain by diking with soil or other absorbent materials and then pump into DOT-approved waste containers. Keep out of sewers, storm drains, surface waters and soil. Comply with all applicable government regulations on spill reporting, and handling and disposal of wastes.

7. HANDLING AND STORAGE

Prevent eye and skin contact. Do not breath mists. Should be stored in cool, dry area away from acids or oxidizers. Keep containers closed and sealed. Protect from physical damage.

8. EXPOSURE CONTROLS / PERSONAL PROTECTION

VENTILATION: Control airborne concentrations below the exposure guideline. Good general ventilation sufficient for most operations.

RESPIRATORY PROTECTION: In misty atmospheres, use an approved mist respirator. If respiratory irritation is experienced, use an approved air-purifying respirator.

SKIN PROTECTION: Use protective clothing impervious to this material. Selection of specific items such as gloves, boots, apron, hard hat with face-shield or full-body suit will depend on operation.

EYE PROTECTION: Use chemical goggles. Full face shield in addition to goggles may be desirable to protect face. Maintain eye wash fountain and safety shower at or near work area.

9. PHYSICAL AND CHEMICAL PROPERTIES

APPEARANCE AND ODOR:	Clear water white liquid. Odorless.	
BOILING POINT:	212°F.	Not available.
MELTING POINT:	Not applicable.	
VAPOR PRESSURE:	Not available.	
SPECIFIC GRAVITY:	(H2O = 1) : 1.15	
VAPOR DENSITY:	Not available.	
% VOLATILE :	Not available.	
pH (1 % Solution):	7.3	
SATURATION IN AIR (BY VOLUME):	Not available.	
EVAPORATION RATE:	Not available.	
SOLUBILITY IN WATER:	100%	

10. STABILITY AND REACTIVITY

STABILITY: Stable.

CONDITIONS TO AVOID: High temperature. Incompatible materials. Keep containers closed and sealed.

POLYMERIZATION: Will not occur.

INCOMPATIBLE MATERIALS: May react with acids and oxidizers.

HAZARDOUS DECOMPOSITION PRODUCTS: Contacts with acids releases irritating and potentially fatal Sulfur Diozide Gas. Sodium Sulfide Residue: flammable, dangerous fire risk, strong irritant to skin and tissue.

11. TOXICOLOGICAL INFORMATION

INGESTION (Acute Oral Toxicity): Rat LD50 = 2825 mg/kg.

SYSTEMIC AND OTHER EFFECTS: Sodium sulfite has been demonstrated to be mutagenic in microbial systems; not considered to present a mutagenic threat to multicell organisms. No effects have been seen in humans.

CARCINOGENITY: This material is not considered to be a carcinogen by the National Toxicology Program, the International Agency for Research on Cancer, or the Occupational Safety and Health Administration

12. ECOLOGICAL INFORMATION

Aquatic Toxicity: Sodium Sulfite: 2600 ppm/24,48 & 96 hr/mosquito fish/TLm/fresh water.
EPA HAZARDOUS SUBSTANCES : NO

13. DISPOSAL CONSIDERATIONS

Disposal must meet all federal, state, and local disposal or discharge laws. Not a hazardous waste.

14. TRANSIT INFORMATION

D.O.T. SHIPPING INFORMATION

APPLICABLE REGULATIONS:	49 CFR 173
SHIPPING NAME:	Water Clarifying, Purifying or Softening Compound
HAZARD CLASS:	Not regulated
PACKING GROUP:	Not applicable
UN NUMBER:	Not applicable
IMDG PAGE:	Not applicable
D.O.T.(Product Reportable Quantity):	Not regulated
HAZARDOUS SUBSTANCES:	None
TRANSPORT LABEL REQUIRED:	Not regulated

15. REGULATORY INFORMATION

INVENTORY INFORMATION

US TSCA: This product is manufactured in compliance with all provisions of the Toxic Substances Control Act, 15 U.S.C.

OTHER ENVIRONMENTAL INFORMATION

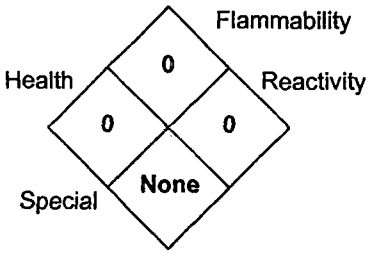
The following components are defined as toxic chemicals subject to reporting requirements of Section 313 of Title III and of 40 CFR 372 or subject to other EPA regulations.

COMPONENT	CAS. NO.	%	TPQ(lbs)	RQ(lbs)	S313	RCRA	TSCA 12 B

PRODUCT CLASSIFICATION UNDER SECTION 311 OF SARA
None

16. OTHER INFORMATION

NFPA HAZARD RATING (National Fire Protection Association)



Hazard Rating Scale: 0=Minimal, 1=Slight, 2=Moderate, 3=Serious, 4=Severe

SPECIAL NOTICE

All information, recommendations and suggestions appearing herein concerning this product are based upon data obtained from the manufacturer and/or recognized technical sources. However, Delta Water Laboratories makes no warranty, representation or guaranty as to the accuracy, sufficiency or completeness of the material set forth herein. It is the user's responsibility to determine the safety, toxicity, and suitability for his own use, handling and disposal of the product. Additional product literature may be available upon request. Since actual use by others is beyond our control, no warranty, expressed or implied, is made by Delta Water Laboratories as to the effects of such use, the results to be obtained or the safety and toxicity of the product, nor does Delta Water Laboratories assume any liability arising out of use by others of the product referred to herein. The data in the MSDS relate only to the

specific material designated herein and do not relate to use in combination with any other material or in any other process.

MATERIAL SAFETY DATA

55 gal stored / 100 gal yr.

Delta Water Laboratories

Effective Date: November 18, 2004
Supersedes: January 20, 2003

1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

PRODUCT NAME: **Delta 2856-C**

Delta Water Laboratories
4206 MLK Blvd
Lubbock, TX 79404

EMERGENCY: (806) 763-4158
TEXAS: (800) 692-4512
24-hour emergency Chem-Tel, Inc: (800) 255-3924

2. COMPOSITION/INFORMATION ON INGREDIENTS

OSHA REGULATED COMPONENTS

COMPONENT	%	OSHA PEL	ACGIH TLV	OTHER LIMIT	HAZARD	CAS NO.
Polymaleic Acid	< 20	No Data	No Data	None	Corrosive	26099-09-2
Maleic Anhydride	< 10	None	None	None	Corrosive	113221-69-5
1-Hydroxyethylidene-1,1 – diphosphonic acid	< 10	None	None	None	Corrosive	2809-21-4
2-phosphono-1,2,4-butanetricarboxylic acid	< 5	None	None	None	Corrosive	37971-36-1
Benzotriazole	< 5	None	None	None	Corrosive	95-14-7
Sodium Molybdate	< 10	5 mg/m^3	5 mg/m^3	None	Irritant	10102-40-6

3. HAZARDS IDENTIFICATION

EMERGENCY OVERVIEW

APPEARANCE AND ODOR: Orange/yellow, clear liquid; sweet odor.

STATEMENTS OF HAZARD: Irritant.

POTENTIAL HEALTH EFFECTS

ROUTES OF EXPOSURE: Skin or eye contact.

EYE CONTACT: Liquid could be corrosive to the eyes. Prolonged contact could cause severe irritation with corneal injury and result in permanent impairment of vision, even blindness.

SKIN CONTACT: Short single exposure could cause severe skin irritation. A latent period may exist between exposure and sense of irritation.

SKIN ABSORPTION: No data found.

INGESTION: Expected to be essentially non-toxic by ingestion.

INHALATION: Mists and sprays could cause irritation to nose, throat and lungs.

SYSTEMIC AND OTHER EFFECTS: No relevant information found.

4. FIRST AID MEASURES

EYES: Immediately flush eyes with lots of running water for 15 minutes, lifting the upper and lower eyelids occasionally. Get immediate medical attention.

SKIN: Immediately wash contaminated areas with plenty of water for 15 minutes. Remove contaminated clothing and footwear and wash clothing before reuse. Discard footwear that cannot be decontaminated. Get medical attention if irritation persists.

INGESTION: Never give anything by mouth to an unconscious person. Give large quantities of water. Do not induce vomiting. If vomiting occurs spontaneously, keep airway clear. Get medical attention immediately.

INHALATION: Remove to fresh air; if breathing is difficult, have trained person administer oxygen. If respiration stops, give mouth-to-mouth resuscitation. Consult a physician.

5. FIRE FIGHTING MEASURES

FLAMMABLE PROPERTIES

FLASH POINT: None.

METHOD USED: Not Applicable.

FLAMMABLE LIMITS: Not Applicable.

EXTINGUISHING MEDIA: Water, foam, carbon dioxide.

FIRE AND EXPLOSION HAZARDS: Under fire conditions, irritating and/or toxic gases and aerosols may be present. Decomposition and combustion products may be toxic (solids).

FIRE FIGHTING EQUIPMENT: Wear self-contained (positive-pressure if available) breathing apparatus and full protective clothing.

6. ACCIDENTAL RELEASE MEASURES

ACTION TO TAKE: For small spills or drips, mop or wipe up and dispose of in DOT-approved waste containers. For large spills, contain by diking with soil or other absorbent materials and then pump into DOT-approved waste containers. Keep out of sewers, storm drains, surface waters and soil. Comply with all applicable government regulations on spill reporting, and handling and disposal of wastes.

7. HANDLING AND STORAGE

Prevent eye and skin contact. Do not breath dusts or mists. Use chemical goggles and impervious gloves. Avoid storing next to alkalis, food and beverages. Should be stored in clean, dry areas. Do not store in underground tanks. Keep containers closed and sealed when not in use.

8. EXPOSURE CONTROLS / PERSONAL PROTECTION

VENTILATION: Control airborne concentrations below the exposure guideline. Good general ventilation sufficient for most operations.

RESPIRATORY PROTECTION: In misty atmospheres, use an approved mist respirator. If respiratory irritation is experienced, use an approved air-purifying respirator.

SKIN PROTECTION: Use protective clothing impervious to this material. Selection of specific items such as gloves, boots, apron, hard hat with face-shield or full-body suit will depend on operation.

EYE PROTECTION: Use chemical goggles. Full face shield in addition to goggles may be desirable to protect face. Maintain eye wash fountain and safety shower at or near work area.

9. PHYSICAL AND CHEMICAL PROPERTIES

APPEARANCE AND ODOR:	Orange, clear, liquid; sweet odor.
BOILING POINT:	Not available.
MELTING POINT:	Not applicable.
VAPOR PRESSURE:	Not available.
SPECIFIC GRAVITY:	1.09
VAPOR DENSITY:	Not available.
% VOLATILE (BY WEIGHT):	Not available.
pH:	3.2 – 4.4.
SATURATION IN AIR (BY VOLUME):	Not available.
EVAPORATION RATE:	Not available.
SOLUBILITY IN WATER:	Complete.

10. STABILITY AND REACTIVITY

STABILITY: Stable.

CONDITIONS TO AVOID: Oxidizing agents. Keep containers closed and sealed.

POLYMERIZATION: Will not occur.

INCOMPATIBLE MATERIALS: Oxidizing agents, steel, bases, sodium hypochlorite solution.

HAZARDOUS DECOMPOSITION PRODUCTS: May liberate phosphines after all water has been removed. Thermal decomposition may produce phosphoric acid, carbon monoxide and carbon dioxide.

11. TOXICOLOGICAL INFORMATION

INGESTION (Acute Oral Toxicity): Rat LD50 (Polymaleic Acid) = 15 g/kg
CARCINOGENITY: This material is not considered to be a carcinogen by the National Toxicology Program, the International Agency for Research on Cancer, or the Occupational Safety and Health Administration.

12. ECOLOGICAL INFORMATION

Rainbow Trout and Bluegill: LC50 96 hr > 2,500 ppm (Polymaleic Acid)

13. DISPOSAL CONSIDERATIONS

Disposal must meet all federal, state, and local regulations.

14. TRANSIT INFORMATION

D.O.T. SHIPPING INFORMATION

APPLICABLE REGULATIONS:	49 CFR
SHIPPING NAME:	Corrosive Liquid, N.O.S.,(Contains 2-phosphono-1,2,4-butanetricarboxylic acid/polymaleic acid)
HAZARD CLASS:	8
PACKING GROUP:	III.
UN NUMBER:	1760
IMDG PAGE:	Not regulated.
D.O.T.(Product Reportable Quantity):	Not regulated.
HAZARDOUS SUBSTANCES:	2-phosphono-1,2,4-butanetricarboxylic acid/polymaleic Acid
TRANSPORT LABEL REQUIRED:	Corrosive

15. REGULATORY INFORMATION

INVENTORY INFORMATION

US TSCA: This product is manufactured in compliance with all provisions of the Toxic Substances Control Act, 15 U.S.C.

OTHER ENVIRONMENTAL INFORMATION

The following components are defined as toxic chemicals subject to reporting requirements of Section 313 of Title III and of 40 CFR 372 or subject to other EPA regulations.

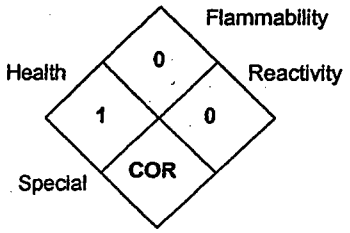
COMPONENT	CAS. NO.	%	TPQ(lbs)	RQ(lbs)	S313	RCRA	TSCA 12 B

This product does not contain any components regulated under these sections of the EPA.

PRODUCT CLASSIFICATION UNDER SECTION 311 OF SARA
2-phosphono-1,2,4-butanetricarboxylic acid/polymaleic acid
SARA TITLE III - Immediate Health Hazard / Delayed Health Hazard

16. OTHER INFORMATION

NFPA HAZARD RATING (National Fire Protection Association)



Hazard Rating Scale: 0=Minimal, 1=Slight, 2=Moderate, 3=Serious, 4=Severe

SPECIAL NOTICE

All information, recommendations and suggestions appearing herein concerning this product are based upon data obtained from the manufacturer and/or recognized technical sources. However, Delta Water Laboratories makes no warranty, representation or guaranty as to the accuracy, sufficiency or completeness of the material set forth herein. It is the user's responsibility to determine the safety, toxicity, and suitability for his own use, handling and disposal of the product. Additional product literature may be available upon request. Since actual use by others is beyond our control, no warranty, expressed or implied, is made by Delta Water Laboratories as to the effects of such use, the results to be obtained or the safety and toxicity of the product, nor does Delta Water Laboratories assume any liability arising out of use by others of the product referred to herein. The data in the MSDS relate only to the specific material designated herein and do not relate to use in combination with any other material or in any other process.

MATERIAL SAFETY DATA

55 gal Stored 75 gal @ yr.

Delta Water Laboratories

Effective Date: April 29, 1999
Supersedes: September 16, 1997

1. CHEMICAL PRODUCT AND COMPANY IDENTIFICATION

PRODUCT NAME: **Delta SL-34**

Delta Water Laboratories
4206 MLK Blvd.
Lubbock, TX 79404

EMERGENCY: (806) 763-4158
TEXAS: (800) 692-4512

2. COMPOSITION/INFORMATION ON INGREDIENTS

OSHA REGULATED COMPONENTS

COMPONENT	%	OSHA PEL	ACGIH TLV	OTHER LIMIT	HAZARD	CAS NO.
Sodium Hydroxide	2-20	2 mg/m^3	2 mg/m^3	None	Corrosive	1310-73-2

3. HAZARDS IDENTIFICATION

EMERGENCY OVERVIEW

APPEARANCE AND ODOR: Clear water white liquid; no odor

STATEMENTS OF HAZARD: Corrosive

POTENTIAL HEALTH EFFECTS

ROUTES OF EXPOSURE: Skin or eye contact.

EYE CONTACT: Liquids, mists or vapors are corrosive to the eyes. May cause severe irritation with corneal injury and result in permanent impairment of vision, even blindness.

SKIN CONTACT: Short single exposure may cause severe skin irritation or burns.

SKIN ABSORPTION: A single prolonged skin exposure is not likely to result in absorption of harmful amounts. The dermal LD50 has not been determined.

INGESTION: May cause gastrointestinal irritation or ulceration and severe burns of the mouth and throat. Single dose oral LD50 has not been determined.

INHALATION: Dusts or mists may cause severe irritation to upper respiratory tract.

SYSTEMIC AND OTHER EFFECTS: No relevant information found.

4. FIRST AID MEASURES

EYES: **Water** is the only accepted method of removal of caustic soda from the eyes or skin. You may have 10 seconds or less to avoid serious permanent injury. Therefore, **immediate** first aid must be given after any injurious exposure. Moving the victim from water access for transport to medical aid should be done only on the advice of qualified medical personnel. While transporting victim to a medical facility, continue washing if possible. In case of eye contact, wash eyes immediately and continuously for 15 minutes. Call for medical assistance immediately.

SKIN: Immediate continued and thorough washing in flowing water for 15 minutes is imperative while removing contaminated clothing. Prompt medical consultation is essential. Wash contaminated clothing before reuse. Destroy contaminated shoes.

INGESTION: Do not induce vomiting. If possible, give lots of water or milk if available and transport to a medical facility.

INHALATION: Remove to fresh air if effects occur. Consult a physician.

5. FIRE FIGHTING MEASURES

FLAMMABLE PROPERTIES

FLASH POINT: None.

METHOD USED: Not Applicable.

FLAMMABLE LIMITS: Not Applicable.

EXTINGUISHING MEDIA: Not combustible.

Boiler - Phosphate -

FIRE AND EXPLOSION HAZARDS: In water solution caustic can react with amphoteric metals (such as aluminum) generating hydrogen, which is flammable and/or explosive if ignited.
FIRE FIGHTING EQUIPMENT: Wear self-contained (positive-pressure if available) breathing apparatus and full protective clothing.

6. ACCIDENTAL RELEASE MEASURES

ACTION TO TAKE: For small spills or drips, mop or wipe up and dispose of in DOT-approved waste containers. For large spills, contain by diking with soil or other absorbent materials and then pump into DOT-approved waste containers. Can be neutralized by dilute inorganic acid, such as hydrochloric, sulfuric, nitric, phosphoric, or acetic. Keep out of sewers, storm drains, surface waters and soil. Comply with all applicable government regulations on spill reporting, and handling and disposal of wastes.

7. HANDLING AND STORAGE

Prevent eye and skin contact. Do not breath dusts or mists.
Avoid storing next to strong acids. Should be stored in clean, dry areas. Do not store in underground tanks. Keep containers closed and sealed.

8. EXPOSURE CONTROLS / PERSONAL PROTECTION

VENTILATION: Control airborne concentrations below the exposure guideline. Good general ventilation sufficient for most operations.
RESPIRATORY PROTECTION: In misty atmospheres, use an approved mist respirator. If respiratory irritation is experienced, use an approved air-purifying respirator.
SKIN PROTECTION: Use protective clothing impervious to this material. Selection of specific items such as gloves, boots, apron, hard hat with face-shield or full-body suit will depend on operation.
EYE PROTECTION: Use chemical goggles. Full face shield in addition to goggles may be desirable to protect face. Maintain eye wash fountain and safety shower at or near work area.

9. PHYSICAL AND CHEMICAL PROPERTIES

APPEARANCE AND ODOR:	Clear water white liquid; no odor
BOILING POINT:	212° F
MELTING POINT:	Not applicable.
VAPOR PRESSURE:	Not available.
SPECIFIC GRAVITY:	1.09
VAPOR DENSITY:	Not available.
% VOLATILE (BY WEIGHT):	Not available
pH:	11.6
SATURATION IN AIR (BY VOLUME):	Not available.
EVAPORATION RATE:	Not available.
SOLUBILITY IN WATER:	100%

10. STABILITY AND REACTIVITY

STABILITY: Stable.
CONDITIONS TO AVOID: Incompatible materials. Keep containers closed and sealed.
POLYMERIZATION: Will not occur.
INCOMPATIBLE MATERIALS: May react with water, acids and a number of organic compounds. May react rapidly with aluminum, tin, and zinc. It may also react with bronze and brass.
HAZARDOUS DECOMPOSITION PRODUCTS: None.

11. TOXICOLOGICAL INFORMATION

INGESTION The oral LD50 has not been determined.
DERMAL: The dermal LD50 has not been determined.
CARCINOGENITY: This material is not considered to be a carcinogen by the National Toxicology Program, the International Agency for Research on Cancer, or the Occupational Safety and Health Administration.

12. ECOLOGICAL INFORMATION

No specific information available.

13. DISPOSAL CONSIDERATIONS

Disposal must meet all federal, state, and local regulations.

14. TRANSIT INFORMATION

D.O.T. SHIPPING INFORMATION

APPLICABLE REGULATIONS:	49 CFR
SHIPPING NAME:	Corrosive Liquid, N.O.S., (Contains Sodium Hydroxide)
HAZARD CLASS:	8
PACKING GROUP:	II
UN NUMBER:	1760
IMDG PAGE:	Not applicable
D.O.T.(Product Reportable Quantity):	1000
HAZARDOUS SUBSTANCES:	Sodium Hydroxide
TRANSPORT LABEL REQUIRED:	Corrosive

15. REGULATORY INFORMATION

INVENTORY INFORMATION

US TSCA: This product is manufactured in compliance with all provisions of the Toxic Substances Control Act, 15 U.S.C.

OTHER ENVIRONMENTAL INFORMATION

The following components are defined as toxic chemicals subject to reporting requirements of Section 313 of Title III and of 40 CFR 372 or subject to other EPA regulations.

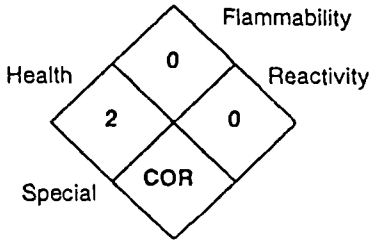
COMPONENT	CAS. NO.	%	TPQ(lbs)	RQ(lbs)	S313	RCRA	TSCA 12 B

This product does not contain any components regulated under these sections of the EPA.

PRODUCT CLASSIFICATION UNDER SECTION 311 OF SARA
Sodium Hydroxide
SARA TITLE III - Immediate Health Hazard

16. OTHER INFORMATION

NFPA HAZARD RATING (National Fire Protection Association)



Hazard Rating Scale: 0=Minimal, 1=Slight, 2=Moderate, 3=Serious, 4=Severe

SPECIAL NOTICE

All information, recommendations and suggestions appearing herein concerning this product are based upon data obtained from the manufacturer and/or recognized technical sources. However, Delta Water Laboratories makes no warranty, representation or guaranty as to the accuracy, sufficiency or completeness of the material set forth herein. It is the user's responsibility to determine the safety, toxicity, and suitability for his own use, handling and disposal of the product. Additional product literature may be available upon request. Since actual use by others is beyond our control, no warranty, expressed or implied, is made by Delta Water Laboratories as to the effects of such use, the results to be obtained or the safety and toxicity of the product, nor does Delta Water Laboratories assume any liability arising out of use by others of the product referred to herein. The data in the MSDS relate only to the specific material designated herein and do not relate to use in combination with any other material or in any other process.

Western Gas Resources, Inc.

December 8, 2006

Mr. Wayne Price
New Mexico Energy, Minerals, and Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: Discharge Plan Renewal GW-033
San Juan River Gas Plant
San Juan County, New Mexico

Dear Mr. Price:

In accordance with Discharge Plan Approval Condition 8, Western Gas Resources, Inc. (WGR) has performed inspections of below grade sumps at the San Juan River Gas Plant. The results of those inspections are enclosed with this letter. WGR inspected five sumps at the San Juan River Gas Plant, all of which were found to be in good condition, with no evidence of leaks or damage. A sixth sump, located at the treating plant, has been out of service since June 2002.

If you have any questions or require additional information concerning this matter, please contact me at (303) 252-6237.

Sincerely,

Ronald R. LePlatt, P.E.
Environmental & Regulatory Manger – Rockies Midstream

Cc: K. McEvers, J. Dixon, R. Specht, R. McClain

Mr. Brandon Powell
Oil Conservation Division – District 3
1000 Rio Brazos Road
Aztec, New Mexico 87410

Sump Inspection

Filter / Storm Drain Sump July 26, 2006

Location: Sump is by Operators Station West of Control Room

This sump is made of concrete. The sump was drained. The sump was cleaned and vacuumed out. The sump is made of two sections. I made a visual and hands on inspection of this sump. All the walls of the sump looked to be in good shape. I found no sign of cracks or breaks in the concrete. The center or middle section was showing some ware on the top part of the wall. The sump looked to be solid and sound. I found no sign of leaking between the section walls. This sump has a 6" drain line. This drain line drains in to the Contact water sump. A safe work permit was made out for the inspection.

Robert McClain

Sump Inspection

Contact Water Sump. July 26, 2006

Location: North of Lab Building by # 6 Down Hole.

This sump is made of 3 steel tanks in to one tank. The sump has a liner. There is a down hole inspection pipe. A sample is taken Monthly and the findings are recorded. All records are recorded in the Plant Spill Prevention Control and Counter Measure Leak Detection (SPCC) book. The sump lids were removed. The Tanks were ventilated before the inspection was made. The sump pump was put on and most all liquids were pumped to the plant inlet. An oil field vacuum truck was used to remove all other liquids in the tanks. The tanks were cleaned. All liquids were vacuumed from the tanks. An Industrial Scientific multi-gas monitor model M40 used to test the tanks. A flammable gas test, 02 Oxygen test, and a toxic gas test were made. These test were done before the inspections.

Flammable Gas Test LEL %

Times	Readings
10:45 A.M.	0
10:55 A.M.	0
11:30 A.M.	0

02 Ox ygen Test

Times	Readings
10:45 A.M.	20.9
10:55 A.M.	20.9
11:30 A.M.	20.9

Toxic Gas Test

Times	Readings
10:45 A.M.	0
10:55 A.M.	0
11:30 AM.	0

I went in to the sump. I cleaned the floor, walls and the welds. The sump was vacuumed out. I made a visual and hands on inspection of the sump. I did an Inspection of the welds, walls and the floors. Every thing looked A-Ok. I found the metal to be in good shape. I found no sign of cracks or breaks in the metal. I found no sign of breaks or cracks in the welds. Every thing looked A-OK.

Robert McClain

2006
Sump Inspection

Boiler House June 28, 2006

Location: South East corner of building in the basement.

This sump is made of concrete. The sump was pumped down and cleaned. The inspection of the sump was hands on and visual. I found no sign of cracks or breaks in the concrete. An inspection of the sumps walls was made. I found no sign of cracks or breaks in the sumps walls. A new electric pump has been installed in place of the old gasoline pump. The sump looked to be in very good shape.

Robert M. McClain

2006
Sump Inspection

Compressor Sump July 11, 2006

Location: North End of Compressor Building.
Inside Dog House

The sump is made of concrete. The sump was pumped down and out. I washed and cleaned the sump. A visual and hands on inspection was made. I found no sign of crack or breaks in the concrete. The sump looked to be solid and be in very good shape. The pump worked very well to pump the sump out. Every thing looked A-OK.

Robert M. McClain

Sump Inspection

Amine Sump July 26, 2006

Location: South of the Treating Plant by the South West doors.

The Amine sump is made of steel. The Amine sump was pumped down as low as it could be. An oil field suction truck was used to pump the sump out. The sump was cleaned. The walls and the floor were cleaned. I went in to the sump and made the inspection. I inspected the walls and the floor. Every thing looked to be in good shape. I made an inspection of the welds. All welds looked to be in good shape. I found no sign of cracks or breaks in the metal. The inspection was a hand on and visual. An Industrial Scientific multi –gas monitor model M40 was used to check the sump. A flammable gas test, 02 oxygen test, and a toxic gas test was performed before the inspection. Every thing checked A-OK.

Flammable Gas Test LEL %

Times	Readings
9:10 A.M.	0
9:15 A.M.	0

02 Oxygen Test

Times	Readings
9:10 A.M.	20.5 %
9:15 A.M.	20.4 %

Toxic Gas Test

Times	Readings
9:19 A.M.	0
8:15 A.M.	0

Robert McClain

2006
Sump Inspection

Treating Plant

July 26, 2006

Location: Treating Plant North side of building.
Sump is no longer needed.
(Out of Service)

The sump was filled with dirt and compacted on June 12, 2002. The I.M.I. crew poured concrete above the fill dirt to seal the sump. All other lines were filled with concrete.

Robert McClain

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 8/16/06

or cash received on _____ in the amount of $ 100.00

from Western Gas Resources Inc

for GW-033

Submitted by: Lawrence Romero Date: 9/20/06

Submitted to ASD by: Lawrence Romero Date: 9/20/06

Received in ASD by: _____ Date: _____

Filing Fee ✓ New Facility _____ Renewal ✓

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

THE BACK OF THIS DOCUMENT CONTAINS AN ARTIFICIAL WATERMARK

Western Gas Resources, Inc.

1099 18th Street, Suite 1200
Denver, CO 80202-1955
Telephone: (303)452-5603

Bank of America
Atlanta, Dekalb County, Georgia
64-1278/611

Check No. [redacted]

Check Date
08/16/2006

Check Amount
$ *******100.00

VOID IF NOT CASHED WITHIN NINETY DAYS

PAY *One Hundred AND 00/100*

TO THE ORDER OF

NEW MEXICO ENVIRONMENTAL DEPARTMENT
WATER QUALITY MANAGEMENT FUND
2040 S PACHECO
SANTA FE, NM 87505

7762

Peter A. Dea

GW-033

[redacted]

[redacted]

Western Gas Resources, Inc.
1099 18th Street, Suite 1200
Denver, CO 80202-1955
Telephone: (303)452-5603

No. [redacted]

Check Date: 08/16/2006

NEW MEXICO ENVIRONMENTAL DEPARTMENT, WATER QUALITY MANAGEMENT FUND, 2040 S PACHECO, SANTA FE, NM 87505 **Vendor No. 7762**

Invoice	Description	Date	Gross Amount	Discount	Net Amount Paid
09-AUG-06	DISCHARGE PLAN FILING FEE	08/09/2006	$100.00	$0.00	$100.00
Detach at Perforation Before Depositing Check		Grand Totals	$100.00	$0.00	$100.00

Western Gas Resources, Inc.

August 30, 2006

Mr. Wayne Price
Environmental Bureau Chief – Oil Conservation Division
New Mexico Energy, Minerals, and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: Discharge Plan Application GW-033
San Juan River Gas Plant
San Juan County, New Mexico

Dear Mr. Price:

Please find enclosed two copies of an application to renew the Discharge Plan for the San Juan River Gas Plant. A copy of the application has also been provided to District 3 of the Oil Conservation Division.

A check in the amount of $100.00 is also enclosed. The check is for the filing fee prescribed by 20.6.2.3114 NMAC.

Thank you for your review of this application. If you should questions concerning this matter, please contact me at (303) 252-6237.

Sincerely,

Ronald R. LePlatt, P.E.
Sr. Environmental Engineer

Cc: K. McEvers, D. Anderson, M. Brinkmeyer, B. Portz

Mr. Brandon Powell
Oil Conservation Division – District 3
1000 Rio Brazos Road
Aztec, New Mexico 87410

DISCHARGE PLAN RENEWAL APPLICATION

WESTERN GAS RESOURCES, INC.
SAN JUAN RIVER GAS PLANT
SAN JUAN COUNTY, NEW MEXICO

Submitted to:

New Mexico Energy, Mineral & Natural Resources Department

Oil Conservation Division

Submitted for:

Western Gas Resources, Inc.

1099 18th Street, Suite 1200

Denver, Colorado 80202

August 30, 2006

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, GEOTHERMAL FACILITES AND CRUDE OIL PUMP STATIONS

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

☐ New ☒ Renewal ☐ Modification

1. Type: Gas Plant
2. Operator: Western Gas Resources, Inc.

   Address: 1099 18th Street, Suite 1200, Denver, Colorado 80202

   Contact Person: Ron LePlatt Phone: (303) 252-6237

3. Location: _____/4 _____/4 Section 1 Township 29 N Range 15W
   Submit large scale topographic map showing exact location.
4. Attach the name, telephone number and address of the landowner of the facility site.
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
6. Attach a description of all materials stored or used at the facility.
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
10. Attach a routine inspection and maintenance plan to ensure permit compliance.
11. Attach a contingency plan for reporting and clean-up of spills or releases.
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
14. CERTIFICATION I hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: Rex L. Specht Title: Vice President - Operations

Signature: _____ Date: 8/30/06

E-mail Address: Ron.LePlatt@anadarko.com

EXECUTIVE SUMMARY

Western Gas Resources, Inc., (WGR), 1099 18th Street, Suite 1200, Denver, Colorado, 80202, submits this Discharge Plan renewal application, dated August 2006, for the San Juan River Gas Plant located in Kirtland, San Juan County, New Mexico. The current discharge plan, GW-033, expires on December 29, 2006. There have been no significant changes at the San Juan River Gas Plant since the last discharge plan renewal application was submitted in December 2001.

Total production of wastewater, both contact and non-contact, is approximately 600,000 gallons per year. The non-contact wastewater consists of condensed steam from the sulfur recovery unit, hydrostatic test water, cooling tower blow-down, and boiler blow-down. The condensed steam from the sulfur recovery unit and the hydrostatic test water are exempt from RCRA Subtitle C regulations. The boiler blow-down is considered non-hazardous due to the non-hazardous nature of the process that produces the wastewater.

Except for a low volume of laboratory wastewater, the contact wastewater stream is exempt from RCRA Subtitle C regulations. The laboratory wastewater is not a hazardous waste, based on its characteristics and laboratory analysis data.

WGR discharges the total wastewater stream to a double lined evaporation pond. There are no effluent discharges direct to ground, surface waters, or to unlined ponds.

A description of plant waste streams is provided in Section 2.0. The wastewater management plan for the plant is presented in Section 3. 1. The management of solid waste streams is discussed in Section 3.3.

TABLE OF CONTENTS

LIST OF FIGURES

LIST OF APPENDICES

1 GENERAL INFORIMATION

1.1 Western Gas Resources Representatives

Local Representative:

Kent McEvers
Operations Superintendent
P.O. Box 70
Kirtland, New Mexico 87417
(505) 598-5601

Technical Representative:

Ron LePlatt
Western Gas Resources, Inc.
1099 18th Street, Suite 1200
Denver, CO 80202
(303) 252-6237

1.2 Location of Discharges

The San Juan River Plant is located in Section 1, Township 29 North, Range 15 West, San Juan County, New Mexico, approximately eight miles west of Farmington and 1.7 miles north of Kirtland, New Mexico. Highway ~~550~~ 64 & 01.11.07 and County Road ~~81~~ 6500 & 01.11.07 provide access to the plant.

The land to the north and west of the plant site is publicly owned. Approximately thirty private parties own tracts located south and east of the plant.

1.3 San Juan River Plant Operations

Current activities at the San Juan River Plant include natural gas sweetening, gas compression, gas dehydration, sulfur recovery, liquid storage, and operation of plant utilities. These utilities include steam producing boilers and a cooling water system.

2 PLANT PROCESSES

2.1 Sources and Quantities of Effluent and Process Fluids

The source of the San Juan River Plant's water is the Public Service of New Mexico (PSNM) power plant located northwest of the WGR facility. Approximately 15,000 gallons of high-quality water are purchased daily from the PSNM power plant.

Contact water (process water that has contacted hydrocarbon streams) is generated at a rate of approximately 150 gallons per day by the following sources:

- Dehydration unit and triethylene glycol (TEG) regeneration - Regeneration of TEG by natural gas dehydration units creates a wastewater stream. This stream is considered to be an exempt waste in accordance with RCRA Subtitle C regulations listed in 40CFR261.4(b)(5). The various exempt waste streams are listed in the May 1995 EPA document number EPA530-K-95-V003.

- Amine reflux and gas inlet - Contact wastewater is produced at the amine reflux and gas inlet vessels. These streams are also considered to be exempt wastes in accordance with RCRA Subtitle C regulations listed in 40CFR261.4(b)(5). The various exempt waste streams are listed in the May 1995 EPA document number EPA530-K-95-V003.

Wastewater is produced by laboratory tests performed at the plant. The tests are performed to determine the content of H_2S in the inlet gas stream. The waste stream consists of water, 1/4% iodine, H_2S extracted from the gas sample, sulfuric acid, and/or hydrochloric acid. No more than one quart per month of the iodine or acids each are used. The laboratory wastewater stream volume is low and the stream is considered to be a non-exempt waste in accordance with 40CFR261.4(b)(5). In 1996, the typical laboratory wastewater stream was collected in a clean 5-gallon pail and a grab sample was retrieved for analyses of hazardous waste characteristics (ignitability, corrosivity, reactivity, and toxicity). The sample results indicated that this waste is not characteristically hazardous. A copy of the 1996 Laboratory analytical results is included in Appendix A. This waste is also not a listed hazardous waste in the RCRA regulations. The laboratory wastewater stream is commingled with the contact wastewater streams. The commingled wastewater stream is considered to be an exempt waste according to RCRA Subtitle C, since the non-exempt waste does not indicate hazardous characteristics prior to commingling and since the contact wastewater streams are considered to be exempt. The mixture rule is also discussed in the EPA document number EPA530-K-95-VO03.

Non-contact wastewater is currently produced at an average rate of 1,440 gallons per day. The non-contact water streams consist of the following:

- Boiler blow-down - Two boilers produce steam for the amine unit and other process requirements. Periodic blow-down is required to reduce total dissolved solids (TDS). This stream is routed to the boiler house sump and subsequently to the contact wastewater sump. This stream is not a RCRA listed hazardous waste and is considered non-hazardous based on process knowledge. Periodic in-plant tests performed for pH

and conductivity also demonstrate that this waste stream does not exhibit characteristics for corrosivity.

- Cooling tower blow-down - An evaporative cooling tower is used to cool water for gas plant processes. Much of the water is recycled, but some periodic blow-down is required to avoid exceeding operating limits for TDS, phosphates, and hardness. Variation in the blow-down rate will occur during the year due to the seasonal operation of the cooling tower system. Cooling tower blow-down in gas production is considered as an exempt waste in accordance with 40CFR261.4(b)(5) and is listed in the EPA document number EPA530-K-95-V003.

- Sulfur recovery plant - Wastewater condensed from the sulfur recovery treatment plant is periodically generated in low volumes. This stream is considered to be an exempt waste in accordance with 40CFR261.4(b)(5). This is referenced specifically as gas plant sweetening wastes for sulfur removal.

Hydrostatic test wastewater is periodically generated during plant maintenance and construction operations. Hydrostatic test wastewater is considered to be exempt waste in accordance with 40CFR261.4(b)(5). Disposal of this water is made directly to the double lined evaporation impoundment.

A summary of the expected annual wastewater discharge volumes is presented below:

Annual Wastewater Discharge Estimation	
Contact water to lined impoundment	55,000 gallons
Non-contact water to lined impoundment	545,000 gallons
Total expected wastewater discharge	600,000 gallons

A site plot plan and a process flow sheet are included in Appendix B.

2.2 Wastewater Characteristics

The non-contact wastewater stream is commingled with the contact wastewater stream in a large sump and then routed to the double lined impoundment. Wastewater characteristics will vary depending upon the ratio of contact to non-contact water being discharged to the impoundment at any given time. More non-contact wastewater is produced during the warm weather months than during cooler months, due to the operation of the cooling tower system.

The following analytical results were obtained from grab samples taken at the lined pond on April 16, 1991 and November 6, 1996. WGR also obtained grab samples of the lab waste, contact, and non-contact wastewaters during November 1996. Results for BTEX and the major cations and anions are presented below for the impoundment's samples.

BTEX ANALYSIS					
CONSTITUENT	RESULTS April 16, 1991 µg/liter	RESULTS April 16, 1991 (mg/L)	RESULTS Nov. 1996 ppb	RESULTS Nov. 1996 ppm (mg/L)	WQ STDS (mg/L)
Benzene	56.0	0.056	254	0.254	0.01
Toluene	18.0	0.013	866	0.866	0.75
Ethyl Benzene	5.5	0.0055	31	0.031	0.75
Total Xylenes	3.2	0.0082	337.5	0.338	0.62

CATION/ANION ANALYSIS		
CONSTITUENT	CONCENTRATION IN MICROGRAMS/LITER, (April 1991)	CONCENTRATION IN MICROGRAMS/LITER (Nov. 1996)
Calcium	840	182
Magnesium	780	553
Potassium	99	1182
Sodium	16,500	16,928
Chloride	28,600	10,450
Sulfate	619	2189
Cation/Anion Balance	94%	NA
Anion/Cation Balance	107%	NA
Cation/Anion Difference	NA	17.0%

2.3 Wastewater Management

All wastewater streams are collected in the contact wastewater sump located on the north side of the gas plant. The sump is constructed of steel and is approximately 10 feet deep. The sump is equipped with a polyethylene double liner. The liner has an interstitial space that is used to monitor for leaks. Wastewater is pumped from the sump to the evaporation impoundment located on the south side of the gas plant.

The boiler blow-down stream is collected in the boiler house sump. From there, it is transferred to the contact wastewater sump. Cooling tower blow-down is transferred directly to the contact wastewater sump.

The storm drain sump is located east of the amine treating unit and west of the control room. In addition to collecting storm water runoff, the sump is used to drain process filters prior to disposal. The sump is constructed of concrete. Liquids collected in the sump are pumped to the contact wastewater sump.

Wastewater is transferred from the contact wastewater sump to the evaporation impoundment via underground piping. Since the wastewater streams do not normally contain significant amounts of hydrocarbons, the accumulation of hydrocarbons is not expected in the evaporation impoundment. If a significant amount of hydrocarbons were to accumulate in the impoundment, it would be skimmed from the water surface.

There is no discharge of wastewater to ground, surface water, or to unlined impoundments. Details concerning the evaporation impoundment are provided in Section 3.1.

Used compressor engine oil, antifreeze, produced water, and other fluid wastes associated with plant operations are not combined with the wastewater streams. These fluids are collected in drums or atmospheric storage tanks to prevent their migration into the environment.

2.4 Spill/Leak Prevention and Housekeeping Procedures

A copy of the Spill Prevention Control and Countermeasure Plan (SPCC) is included in Appendix C. The spill/leak prevention and housekeeping procedures are discussed in the following sections.

2.4.1 Monitoring of Wastewater Disposal Systems

The wastewater handling and disposal system includes adequate provisions for detection of equipment and liner leaks. The contact wastewater sump is equipped with a double liner that is monitored for leaks (Well #6). The evaporation impoundment is equipped with monitoring wells (Wells #1 and #2) for the detection of leaks. The impoundment and sump are monitored monthly for the presence of leaks. Monitoring records at maintained at the plant office.

Construction details for the evaporation impoundment are provided in Section 3.1 and in Appendix B. The pond berms and exposed portions of the liner are inspected monthly. As discussed above, the leak detection system monitoring wells are also inspected monthly.

In accordance with the current Discharge Plan approval, all sumps at the plant are inspected annually. Inspection reports are maintained at the plant office and are submitted to the Oil Conservation Division. The current Discharge Plan approval also requires that all below ground process and wastewater lines be tested to demonstrate mechanical integrity at least every five years. The below ground lines at plant were subjected to pressure tests during the period of August 22 to November 21, 2002.

2.4.2 Protection from Spills and Leaks

Western Gas Resources intends to act responsibly to avoid spills or leaks that might harm the environment. Plant personnel are aware of the imperative nature of spill prevention. Housekeeping measures require prompt identification of leaks, drips and spills.

The San Juan River Gas Plant property is enclosed by a fence to minimize trespassing. With the exception of limited Y-grade natural gas liquid storage east of the plant yard, there is no large scale processing or storage of hydrocarbons at the plant. Therefore, large spills of hydrocarbons are unlikely.

WGR utilizes two concrete storage basins (basin "A" and "B") for the storage of hazardous materials. The basins were previously used as containment for cooling towers that have been dismantled and removed.

The following substances are stored in basin "A" in quantities of 500 gallons or less: solvent, gasoline, and diesel fuel. Methanol is also stored in basin "A" at a quantity of 1000 gallons or less. The basin walls are high enough to adequately contain the contents of a ruptured tank.

WGR uses the concrete basin "B" beneath the tower as a drum storage area. Empty drums are also stored in this area. Drums are not likely to be disturbed since they are located away from normal work areas.

WGR stores cooling tower and boiler chemicals inside plant buildings on concrete floors. Accidental spills of these chemicals onto the building floors are promptly cleaned up.

In April 1999 WGR implemented the use of four aboveground pressurize storage tanks. Three 40,000-gallon "bullet" type tanks are located east of the plant yard and are used for the storage of Y—grade natural gas liquids. Storage of the Y-grade NGL is intermittent, since the material is usually pumped directly to a liquids pipeline. Y-grade liquid product is considered to be a gas at ambient conditions. Therefore, the tanks are not equipped with secondary containment.

The fourth tank is a 17,000- gallon pressurized tank that is used to receive pipeline pigging liquids. The tank is equipped with a berm and a 30-mil liner for containment of spills.

Additional storage tanks at the facility include those used for the storage of produced water, amine, triethylene glycol, and used and new refined oils. As required by SPCC regulations, tanks are provided with secondary containment and are designed to prevent leaks and spills. Additional details are provided in the SPCC plan that is attached at Appendix C.

2.4.3 Spill Response Measures

WGR procedures require prompt attention to releases of hydrocarbons and hazardous materials. The following substances are present at the plant site and could potentially be released to the environment:

- Refined hydrocarbons such as engine oil, diesel fuel, and gasoline
- Chemicals such as sulfuric acid, boiler and cooling tower chemicals, amine, and triethylene glycol
- Plant products and by-products, including natural gas liquids, produced water, pigging sludge, sulfur, contact wastewater, and non-contact wastewater

WGR will respond to a spill in accordance with the facility SPCC plan, which is included as Appendix C. Generally, the following procedures will be followed:

(1) Plant employees will implement appropriate response measures and will report the spill to the Operations Superintendent.
(2) The Operations Superintendent will notify WGR Environmental Engineering staff in Denver. The Environmental Engineering staff will determine whether the spill is reportable to any regulatory agencies and, if so, submit the required reports.
(3) Under the direction of the Operations Superintendent, plant personnel will implement appropriate cleanup measures. If requested, Environmental Engineering will provide guidance and oversight.

Absorbent pads and booms are available at the plant site, although the site location makes a discharge to surface water highly unlikely. In the event of a discharge to land, shovels and sand are available for cleanup. Contaminated materials will be handled according to applicable environmental regulations. See Section 3.3 for discussion of solid waste disposal.

3 WASTEWATER AND SOLID WASTE DISPOSAL

There is no discharge of wastewater to surface or ground water at the San Juan River Gas Plant. Plant practices are not expected to threaten surface or ground water quality.

3.1 On-site Facilities

The combined contact and non-contact wastewater streams flow through and oil/water separator and to a lined evaporation pond that includes a leak detection/leachate collection system.

The lined impoundment, located at the south end of the plant property, is lined with high density polyethylene (HDPE), and has the following specifications:

Liner:	45-mil HDPE on sides, 30-mil HDPE on pond bottom
Dimensions:	250 feet x 150 feet x 4 feet, 4 inches
Volume:	773,000 gallons with 1-foot freeboard
Slope:	1.3 slope on sides, 1: 125 slope on pond bottom
Leachate Collection:	Slotted 4-inch PVC drains within 1-foot sand layer
Leak Detection:	Monitoring, wells connected to collection system
Secondary Containment:	6-inch clay liner beneath sand layer

This impoundment has been in use since its construction in 1987.

The pond design is shown on Figures 2B and 2C, which are included in Appendix B. The pond is configured with a leak detection/leachate collection system that is inspected monthly. The leachate collection system consists of slotted four-inch PVC Schedule 80 piping buried within a one-foot sand layer directly beneath the HDPE liner. A six-inch layer of compacted clay located directly beneath the sand layer prevents migration of contaminants into the subsurface. The leak detection system consists of two monitoring wells, which are directly connected to the leachate collection piping.

Annual discharge to the pond is expected to be 600,000 gallons. Of this total, 55,000 gallons is contact water. Non-contact water contributes the remaining 545,000 gallons of total discharge. The pond has a significantly greater capacity than is currently required for the annual wastewater discharge. A substantial portion of the pond bottom is dry throughout much of the year. A minimum freeboard of one foot is to be maintained. The pond is netted in accordance with NMOCD regulations.

On occasion, disposal of pipeline hydrostatic test water is necessary. Disposal of hydrostatic test water is expected to occur no more than twice annually. The water will be discharged to the evaporation pond.

3.2 Off-site Disposal – Wastewater

Wastewater produced at the San Juan Plant is not routinely disposed of off-site. As a contingency measure, in the unlikely event that effluent volumes exceed the capacity of the pond, the water could be transported to a permitted Class II disposal well, since the

wastewaters have been deemed exempt from RCRA Subtitle C. Approval of the well operator and the NMOCD would be obtained prior to disposal of wastewater at an off-site disposal well.

3.3 Solid Wastes

Solid wastes generated at the San Juan River Gas Plant are generally exempt from RCRA hazardous waste regulations. They are managed in accordance with 19.15.9.712 NMAC. WGR uses Waste Management's landfill facility located in Cortez, Colorado for disposal of most gas plant waste materials. Pipeline pigging sludge is shipped to Envirotech Inc. facilities for landfarming. Other plant wastes such as office trash are shipped to the San Juan County Regional Landfill. Listed below are NMOCD Rule 712 wastes that are shipped off-site disposal:

712 D. (1) Wastes:
- Empty and RCRA-clean barrels, 5-gallon buckets, and 1-gallon containers
- Uncontaminated construction debris
- Uncontaminated concrete
- Non-friable asbestos and asbestos-containing materials
- Uncontaminated elemental sulfur
- Office trash
- Paper and empty paper bags
- Soiled rags or gloves that pass Paint Filter Test
- Uncontaminated wood pallets

712 D. (2) Wastes:
- Activated alumina
- Activated carbon
- Amine filters
- Gas condensate filters
- Glycol filters
- Junked pipes, valves, and metal pipe
- Molecular sieve
- Pipe scale and other deposits removed from pipeline and equipment
- Oil filters

712 D. (3) Wastes:
- Sulfur contaminated soil
- Contaminated soil other than petroleum contaminated soil
- Petroleum contaminated soil
- Demolition debris not otherwise specified
- Contaminated elemental sulfur
- Other wastes as applicable, including mole sieve dust filters and cryogenic skid inlet gas filters

3.4 Recycled Materials

Approximately 9,000 gallons of used lubricating oil are produced at the plant per year. The used oil is stored in Tank TK-8901, which is located east of the Compressor Building. The used oil is transported to an off-site recycling facility.

4 SITE CHARACTERISTICS

The physical characteristics of the plant site have been studied in detail as part of a previously completed land application feasibility study completed in 1986 and 1987. Detailed information concerning site soil and ground water characteristics are presented in the Phase I and II feasibility study reports, and should be consulted if more specific information is required than provided in the following summary.

4.1 Hydrologic Features

Surface water run-off from the plant site is expected to follow the local topographic contours. The topography slopes to the northwest across the majority of the site, although a south-southeasterly slope is apparent in the southeastern portion of the site. The topographic gradient across most of the site is relatively flat (on the order of 0.0 1 feet/foot), with the exception of moderate to steep topographic gradients encountered on the flanks of Flare Hill. The infiltration rate of the majority of the surficial deposits is high (Sheppard soil = 8.9 in/hr). Therefore, large-scale overland flow of surface runoff is not anticipated to occur under all but the most extreme storm or flood events.

Surface water bodies within a one-mile radius of the site include 1) the Stevens Arroyo (0.2 miles west), 2) the Farmers Mutual Ditch (0.5 miles south), and 3) small fresh water ponds located on the golf course south of the site. The Stevens Arroyo is an intermittent watercourse. The San Juan River is located greater than one mile south of the plant site.

Based on New Mexico State Engineer well records, ground water wells in the area are generally completed within the shallow alluvial aquifer at approximately 75 feet below ground surface and are permitted for "domestic" water usage. Ground water is anticipated to discharge as a seep approximately 0.75 miles south of the site where the base of the alluvial aquifer is exposed.

Shallow ground water is contained within alluvial terrace gravel deposits beneath the site. The alluvial sediments are underlain by greenish grey sediments of the Lower Shale Member of the Kirtland Shale. The Kirtland Shale is exposed in the extreme northern and western portions of the site, and approximately 0.5 miles south of the site. The thickness of the alluvial sediments varies from zero feet in the extreme northern and western portions of the site, to greater than 70 feet in the southern and eastern portions of the site. Depth to ground water varies across the site. It is estimated to be less than ten feet below the surface in the extreme northern and western portions of the site where the alluvial sediments are thin to nonexistent and greater than 50 feet in the extreme southern and eastern portions of the site. Regional ground water flow is to the southwest beneath the majority of the site, with local south to southeasterly flow in the southeast portion of the site.

4.2 Surface and Groundwater Quality

Groundwater samples from on-site monitoring wells and off-site local wells were analyzed for various water quality parameters as part of the Phase I and II feasibility study in 1987. Results of these analyses indicate that WQCC standards for TDS, sulfate, and manganese are exceeded in on-site wells. TDS, sulfate, and chloride content exceed WQCC standards in all

off-site wells. The average TDS for on-site wells is 4,500 mg/L and is 2,775 mg/L for local wells.

Background ground water quality can be assessed from water quality data obtained from the Daley well (the only local well not located down gradient from the plant site). It is interesting to note that the TDS concentration in the Daley well (4,300 mg/L) is higher than that of the local wells located down gradient of the plant site and is near the average TDS concentration for on-site wells (4,500 mg/L). This fact, in conjunction with the high chloride concentrations in the Daley well, suggests that background water quality is comparable to that beneath the plant site.

Surface water quality samples have been obtained from the Stevens Arroyo located west of the plant site. Background water quality from Stevens Arroyo reportedly exceeds 10,000 mg/L for TDS and, therefore, exceeds the WQCC limit for surface water.

5 CLOSURE PLAN COMMITMENT

WGR will commit to the preparation of a closure plan in accordance with the New Mexico Water Quality Control Commission regulation number 3107A.11. At this time, WGR has no plans to close the existing evaporation pond or the facility.

APPENDIX A

ANALYTICAL RESULTS

Inter·Mountain
Laboratories, Inc.

2506 West Main Street
Farmington, New Mexico 87401
Tel. (505) 326-4737

James Fleak
Western Gas Resources, Inc.
12200 N. Pecos Street
Denver, Co. 80234

26 November 1996

Mr. Fleak:

Enclosed please find the reports for the sample received by our laboratory for analysis on November 19, 1996.

If you have any questions about the results of these analyses, please don't hesitate to call me at your convenience.

Sincerely,

Sharon Williams
Organic Analyst Supervisor

Enclosures

xc: Kent McEvers
File

Inter-Mountain Laboratories, Inc.

2506 W. Main Street
Farmington, New Mexico 87401

Client: Western Gas Resources
Project: Kirtland, NM
Sample ID: Lab Waste 3
Laboratory ID: 0396G02513
Sample Matrix: Liquid
Condition: Intact

Date Reported: 11/26/96
Date Sampled: 11/19/96
Date Received: 11/19/96

Analyte	Result	Units
Ignitability	>140	°F
Corrosivity (pH)	8.82	
Barium	<0.01	ppm
Reactive Cyanide	<0.010	ppm
Reactive Sulfide	<0.01	ppm

Reg. Level = 100 ppm

ND - Analyte not detected at stated detection level.

References:

Analysis performed according to SW-846 "Test Methods for Evaluating Liquid/Solid Waste: Physical/Chemical Methods" United States Environmental Protection Agency 3rd Edition, final Update II, September, 1994.

ASTM Annual Book of Standards

Reported by: _____

Reviewed by: _____

Inter-Mountain Laboratories, Inc.

2506 W. Main Street
Farmington, New Mexico 87401

Quality Control / Quality Assurance

Known Analysis / Method Blank Analysis / Spike Analysis
TOTAL METALS

Client: Western Gas Resources
Project: Kirtland
Sample Matrix: Liquid

Date Reported: 11/26/96
Date Analyzed: 11/25/96
Date Received: 11/19/96

Parameter	Found Result	Known Result	Units	Percent Recovery	Acceptance Limits
Barium	0.98	1.00	mg/L	98%	90-110%

Method Blank Analysis

Parameter	Result	Detection Limit	Units
Barium	ND	0.01	mg/L

Spike Analysis

Parameter	Spike Result (mg/L)	Sample Result (mg/L)	Spike Added (mg/L)	Percent Recovery	Acceptance Limits
Barium	0.55	<0.01	1.00	*55%	85-115%

Reference: Analysis performed according to SW-846 "Test Methods for Evaluating Solid Waste: Physical / Chemical Methods" United States Environmental Protection Agency 3rd Edition, Final Update II, September, 1994.

ASTM Annual Book of Standards

Comments: *Spike did not recover due to matrix interference such as sulfate.

Reported by _____

Reviewed by _____

Inter·Mountain Laboratories, Inc.

2506 W. Main Street
Farmington, New Mexico 87401

Quality Control / Quality Assurance

Known Analysis
FLASH POINT

Client: Western Gas Resources
Project: Kirtland
Sample Matrix: Liquid

Date Reported: 11/26/96
Date Analyzed: 11/22/96
Date Received: 11/19/96

Parameter	Found Result	Known Result
p-Xylene	76°F	77°F

Reference: Analysis performed according to SW-846 "Test Methods for Evaluating Solid Waste: Physical / Chemical Methods" United States Environmental Protection Agency 3rd Edition, Final Update II, September, 1994.

ASTM Annual Book of Standards

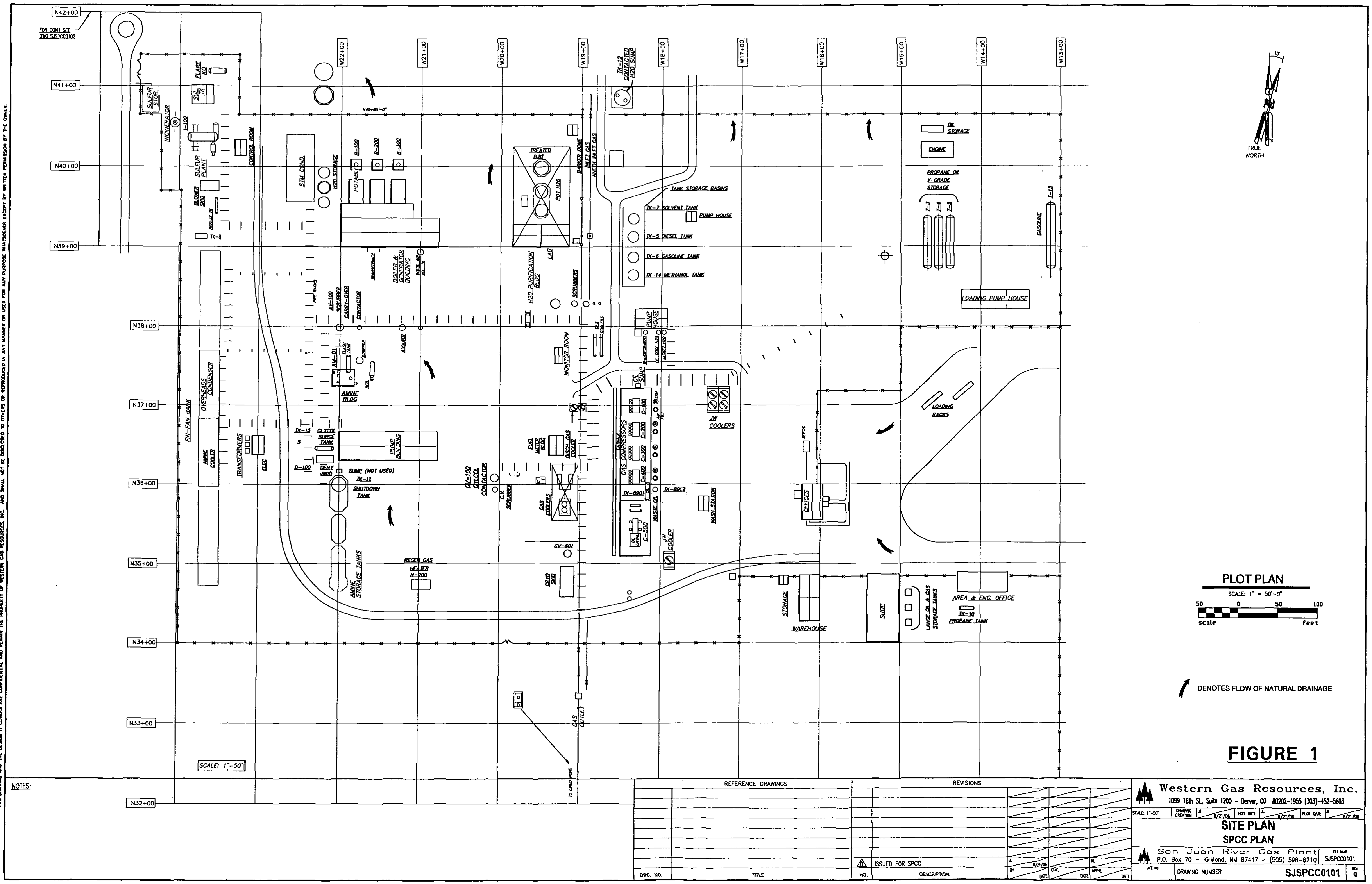
Comments:

Reported by _____

Reviewed by _____

APPENDIX B

FIGURES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N37+00
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N35+00
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N33+00
N32+00
W22+00
W21+00
W20+00
W19+00
W18+00
W17+00
W16+00
W15+00
W14+00
W13+00
SULFUR STOR.
INCINERATOR
FLARE KO
SUL TK
SULFUR PLANT
CONTROL ROOM
BLOWER SKID
TK-8
STM COND.
H2O STORAGE
POTABLE
B-100
B-200
B-300
BOILER & GENERATOR BUILDING
TREATED H2O
POT H2O
H2O PURIFICATION BLDG
LAB
BARKER DOME
INLET GAS
ANETH INLET GAS
TK-12 CONTACTED H2O SUMP
TANK STORAGE BASINS
TK-7 SOLVENT TANK
PUMP HOUSE
TK-5 DIESEL TANK
TK-6 GASOLINE TANK
TK-14 METHANOL TANK
OIL STORAGE
ENGINE
PROPANE OR Y-GRADE STORAGE
GASOLINE
LOADING PUMP HOUSE
TRUE NORTH
AV-100 SCRUBBER
CARRY-OVER
CONTACTOR
AV-401
SCRUBBERS
MONITOR ROOM
PUMP HOUSE
AM-01
AMINE BLDG
FIN-FAN BANK
OVERHEADS CONDENSER
AMINE COOLER
TRANSFORMERS
ELEC
TK-15
GLYCOL SURGE TANK
D-100
DEHY SKID
SUMP (NOT USED)
TK-11
SHUTDOWN TANK
PUMP BUILDING
AMINE STORAGE TANKS
REGEN GAS HEATER H-200
GV-100 GLYCOL CONTACTOR
FUEL METER BLDG
RESIDUE GAS COOLER
GAS COOLERS
GV-601
CRYO SKID
GAS COMPRESSORS
C-100
C-200
C-300
C-400
C-500
TK-8901
TK-8902
WASTE OIL
OIL SUMP
JW COOLER
JW COOLERS
WASH STATION
LOADING RACKS
OFFICES
SEPTIC
STORAGE
WAREHOUSE
SHOP
LANCE OIL & GAS STORAGE TANKS
AREA & ENG. OFFICE
TK-10 PROPANE TANK
GAS OUTLET
TO LINED POND
SCALE: 1"=50'
PLOT PLAN
SCALE: 1" = 50'-0"
50 0 50 100
scale feet
DENOTES FLOW OF NATURAL DRAINAGE
FIGURE 1
NOTES:
REFERENCE DRAWINGS
REVISIONS
DWG. NO.
TITLE
NO.
DESCRIPTION
ISSUED FOR SPCC
BY
DATE
CHK.
APPR.
Western Gas Resources, Inc.
1099 18th St., Suite 1200 - Denver, CO 80202-1955 (303)-452-5603
SCALE: 1"=50'
SITE PLAN
SPCC PLAN
San Juan River Gas Plant
P.O. Box 70 - Kirkland, NM 87417 - (505) 598-6210
SJSPCC0101
DRAWING NUMBER
SJSPCC0101
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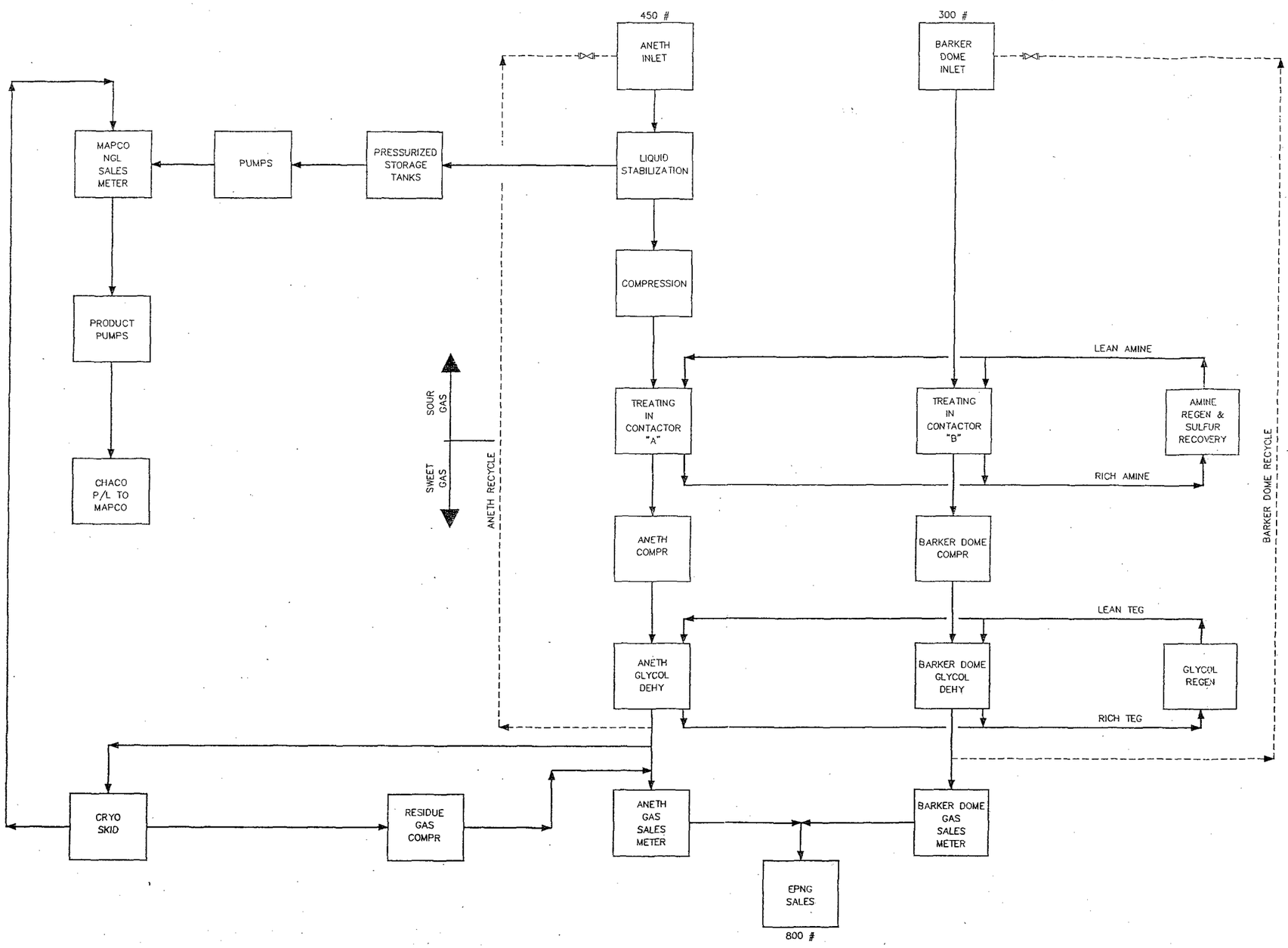

NOTES:

REFERENCE DRAWINGS			REVISIONS						
			2	ISSUED FOR PERMIT	T.T.	12/19/01	MB	12/19/01	GL
			1	PRELIMINARY	LCA	5/1/98	DCJ	5/1/98	
DWG. NO.	TITLE		NO.	DESCRIPTION	BY	DATE	CHK.	DATE	APPR. DATE

Western Gas Resources, Inc.
12200 N. Pecos St. – Denver, Colorado 80234 – (303) 452-5603

SCALE: NONE	DRAWING CREATION	LCA 5/1/98	EDIT DATE	12/19/01 T.T.	PLOT DATE	12/19/01 T.T.

BLOCK FLOW DIAGRAM
PROCESS FLOW

San Juan River Gas Plant
P.O.Box 70 – Kirtland – (505)598-6210

FILE NAME	SJBF0001
AFE NO. 328712	DRAWING NUMBER SJBF0001
REV.	A

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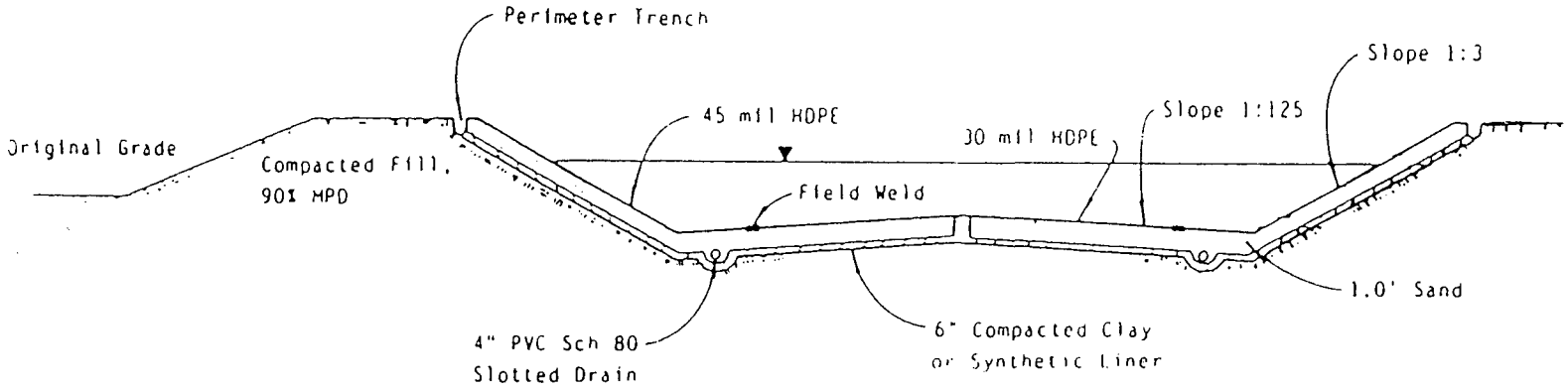
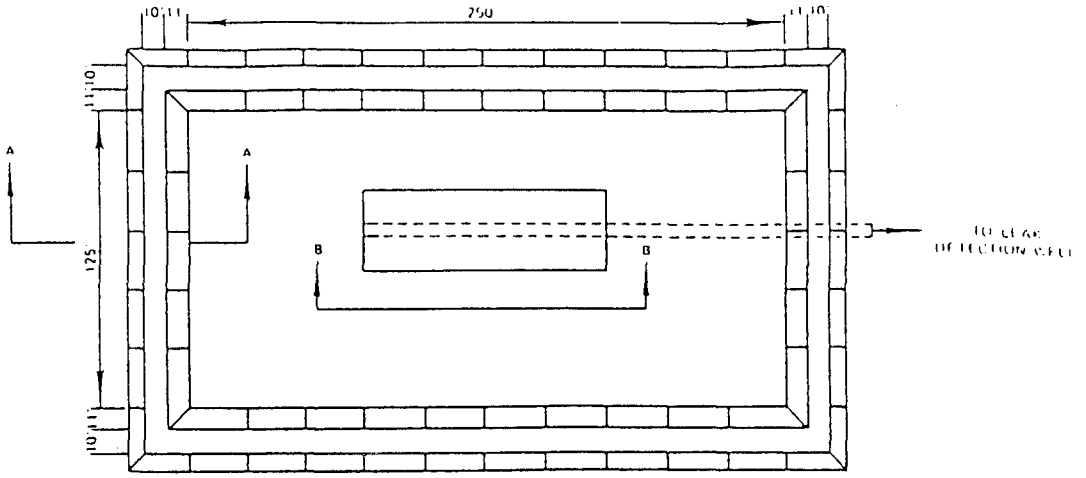
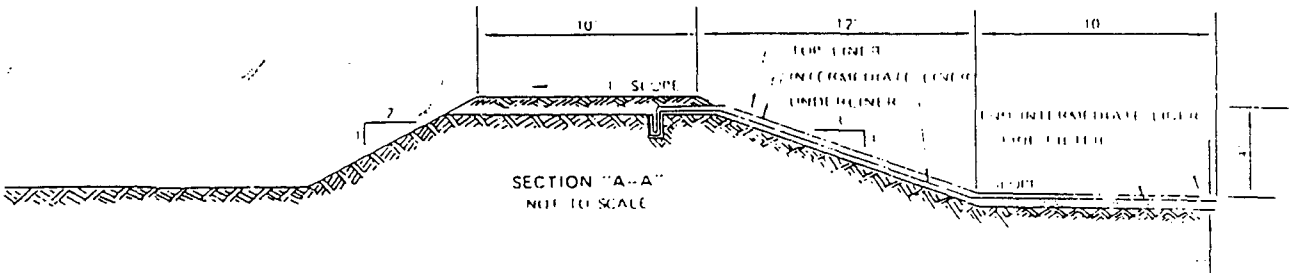


DISCHARGE PLAN WESTERN GAS RESOURCES, INC. SAN JUAN RIVER PLANT San Juan County, New Mexico September, 1991	EVAPORATION POND DESIGN Figure 2B
Modified from El Paso Natural Gas Company Discharge Plan	Scale: None



SAN JUAN RIVER PLANT EVAPORATION POND



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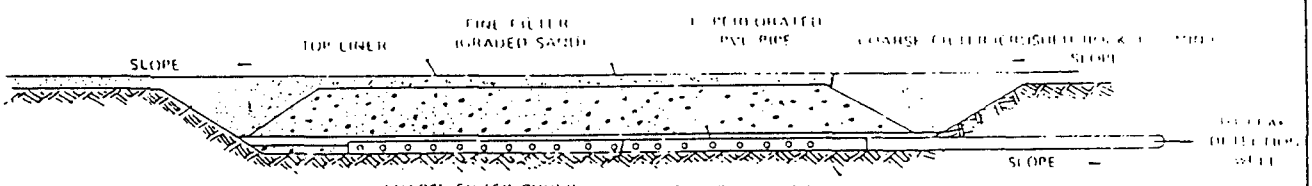

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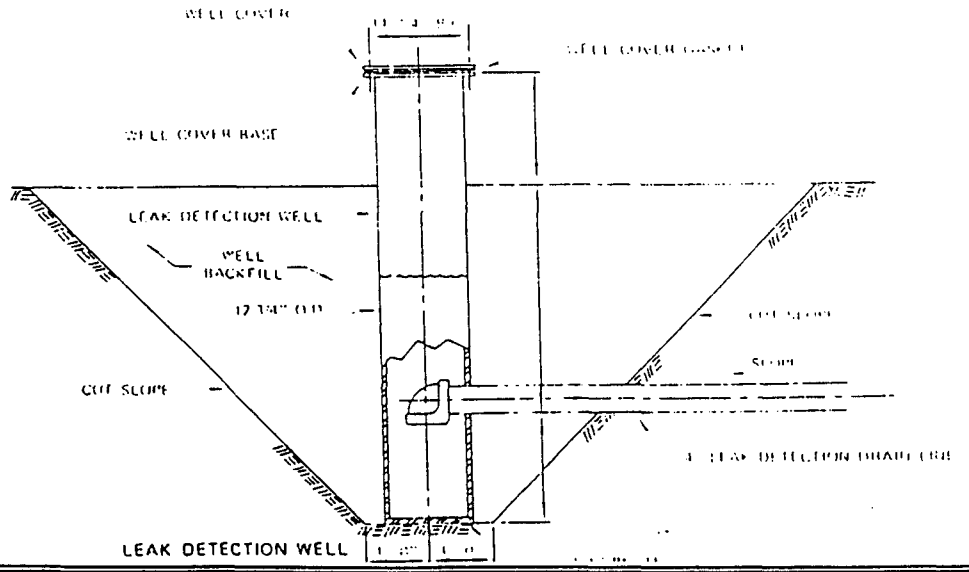

DISCHARGE PLAN WESTERN GAS RESOURCES, INC. SAN JUAN RIVER PLANT San Juan County, New Mexico September, 1991	EVAPORATION POND DESIGN Figure 2C
Modified from El Paso Natural Gas Company Discharge Plan	Scale: None

APPENDIX C

SPILL PROVENTION CONTROL AND COUNTERMEASURE PLAN

WESTERN GAS RESOURCES, INC.
1099 18th Street, Suite 1200
Denver, Colorado
80202

SPILL PREVENTION CONTROL and COUNTERMEASURES PLAN

SAN JUAN RIVER GAS PLANT
Kirtland, New Mexico

San Juan River Gas Plant
Spill Prevention Control and Countermeasures Plan

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Section

REGULATORY CROSS REFERENCE

Citation	Description	Section
§112.3(d)(1)	Professional Engineer Certification	1.2
§112.5(a) & (b)	Management of Five Year Review	1.1.2
§112.7(a)	General requirements: discussion of facility's conformance with rule requirements; deviations from Plan requirements; facility characteristics that must be described in the Plan; spill reporting information in the Plan; emergency procedures	1, 2
§112.7(b)	Fault analysis	2.1
§112.7(c)	Secondary containment	2.1, 2.2
§112.7(d)	Contingency planning	1.8.2
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§112.7(f)	Employee training	1.6
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§112.8(b)	Facility drainage	2.3
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SECTION 1.0 – GENERAL OPERATIONS

Section 1.1.1 – Management Approval

Western Gas Resources, Inc. (Western) is committed to the prevention of discharges of oil to navigable waters and the environment, and maintains strict corporate and industry standards for oil spill prevention and spill response through periodic review, revision and implementation of this Spill Prevention Control and Countermeasures (SPCC) Plan. Should a discharge occur, Western would provide the necessary manpower, equipment and materials required to expeditiously control and remove any harmful quantity of oil discharged.

Signature: _____

Name: Michael W. Brinkmeyer

Title: Operations Manager Northern Region

Date: 8/24/06

Section 1.1.2 – Plan Review

In accordance with 40CFR112.5(b), a review and evaluation of this SPCC Plan will be conducted at least once every five (5) years. Any amendments to this SPCC Plan will be prepared within six (6) months of a change in the facility design, operation, or maintenance. Additionally, any new construction at the facility affecting this SPCC Plan will result in an amendment to this SPCC Plan. Any amendments will be implemented as soon as possible but not later than six (6) months following preparation of the amendment. Technical amendments to this SPCC Plan will be certified by a Professional Engineer. Technical amendments are required for changes that materially affect the facility's potential to discharge oil, including the addition, removal, or reconstruction of containers; the alteration of secondary containment structures and devices; and changes in operational or maintenance procedures. Non-technical amendments to this SPCC Plan are not required to be certified by a Professional Engineer. Non-technical amendments include changes in contact lists, phone numbers, and product changes so long as the new product is compatible with the existing tank and secondary containment. Amendments and reviews of this SPCC Plan are documented below:

Review/ Amend Date	Signature	Amend Plan (will/will not)	Description of Review Amendment	Affected Page(s)	P.E. Certification (Y/N)

Section 1.2 - Professional Engineer Certification

By means of this Professional Engineer Certification I hereby attest to the following:

- I am familiar with the requirements of Title 40, Code of Federal Regulations, Part 112 – Oil Pollution Prevention (40CFR112) and have verified that this Plan has been prepared in accordance with the requirements of this Part.
- My agent or I have visited and examined the Facility(s).
- I have verified that this Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards.
- I have verified that the required inspection and testing procedures have been established as described in Section 2.5.
- I have verified that the Plan is adequate for the Facility.

Ronald R. LePlatt

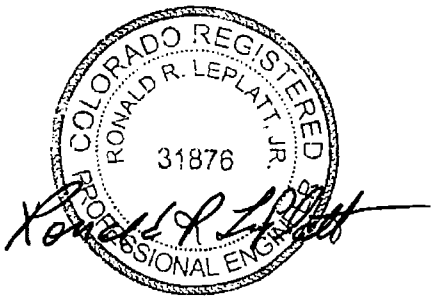
Printed Name of Registered Professional Engineer

Signature of Registered Professional Engineer

Date: 8/24/06

Registration Number: 31876

State: CO



(Seal)

SECTION 1.3 – SUBSTANTIAL HARM CERTIFICATION
SAN JUAN RIVER GAS PLANT
Kirtland, New Mexico

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?

   YES _____ NO ___X___

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?

   YES _____ NO ___X___

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 such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?

   YES _____ NO ___X___

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 such that a discharge from the facility would shut down a public drinking water intake?

   YES _____ NO ___X___

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?

   YES _____ NO ___X___

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.

Ronald R LePlatt
Signature

Sr. Environmental Engineer
Title

Ronald R. LePlatt
Name (please type or print)

8/24/06
Date

Section 1.4 – Contact List

1. Name of Facility: **San Juan River Gas Plant**

2. Type of Facility/description: **Oil Non-production Facility (Onshore)/ Natural Gas Treating & Processing Plant**

3. Location of Facility: **Section 1, T29N, R15W**
   Kirtland, San Juan County, New Mexico

4. Name of Owner/operator: **Western Gas Resources, Inc.**
   Address: **1099 18th Street, Suite 1200**
   Denver, Colorado 80202
   Phone: **303-452-5603**

5. Designated person accountable for oil spill prevention at facility:
   Name and Title: **Kent McEvers**
   Operations Superintendent
   Phone: **505-598-5601**
   505-860-7208 (mobile)
   505-326-4054 (home)

   Location of Plan: **San Juan River Gas Plant**
   99 County Road 6500
   Kirtland, New Mexico

6. Designated person accountable for oil spill prevention at home office:
   Name and Title: **Ron LePlatt**
   Senior Environmental Engineer
   Phone: **303-252-6237**

Section 1.5 – Incident Response

All spills of *any size* should be reported. Report the spill to the Operations Superintendent or designated personnel accountable for oil spill prevention at the particular facility (see section 1.4 for contact information).

Complete a Spill Report Form (APPENDIX C) including the following information:

- Facility name;
- Legal description of location where release occurred (if available);
- Date and time of the incident;
- Source and cause of the incident;
- Type of material;
- Quantity of material;
- Direction of flow from source;
- Waterway affected including amount reaching water;
- Weather conditions;
- Action taken to contain and control discharge;
- Number and type of injuries (if any); and,
- Other pertinent information specific to the discharge.

If the person reporting the spill is unable to locate the designated accountable person, contact Ron LePlatt.

Operations Superintendent Reporting Responsibility

The Operations Superintendent will contact Ron LePlatt in Western's Denver office with the above spill information plus discuss methods of spill control and clean up.

Environmental Department Reporting Responsibility

Ron LePlatt will notify government agencies, Western personnel, and the affected landowner(s) with the above information. He will also be responsible for preparing and submitting the written reports that are required by the various agencies. A copy of these reports will also be maintained at the San Juan River Gas Plant and the Denver office for no less than three (3) years.

National Response Center

1.800.424.8802 (*24 hour phone*)

U.S. Environmental Protection Agency- Region VIII

1.303.293.1788 (Oil Spill Hotline)

A spill of oil in such quantities that:

- Violate applicable water quality standards; or
- Causes a film or sheen upon or discoloration of the surface of the water or adjoining shorelines or cause a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines

State of New Mexico

New Mexico Environment Department (NMED)

Non-emergencies: (866) 428-6535 (*24-hour phone*)

Emergencies: (505) 827-9329 (*24-hour phone*)

The state of New Mexico has not established reportable quantities for releases of hazardous materials or petroleum. The NMED requires reporting for any release of any material in such quantity as may with reasonable probability injure or may be detrimental to human health, animal or plant life, or property, or may unreasonably interfere with the public welfare or the use of property.

Verbal notification must be provided to the NMED as soon as possible after learning of a reportable discharge, but in no event more than twenty-four hours thereafter.

State of New Mexico Oil Conservation Division (OCD)

District 3 Office: (505) 334-6178

Environmental Bureau Chief: (505) 476-3490

Releases of produced water, condensate, crude oil, natural gases, and oilfield waste are subject to OCD reporting requirements. A **major release** is:

- A release with a volume in excess of 25 barrels (excluding natural gases)
- A release of natural gases in excess of 500 mcf
- A release of any volume that results in a fire, will reach a water course, may with reasonable probability endanger public health, or results in substantial damage to property or the environment
- A release of any volume which may with reasonable probability be detrimental to water or cause exceedance of the standards in 19 NMAC 15.1.19 B(1), B(2), or B(3)

A major release is to be reported by giving immediate verbal notification to the District 3 Office. For any release that may with reasonable probability be detrimental to water or cause an exceedance of the standards in 19 NMAC 15.1.19 B(1), B(2), or B(3), an immediate verbal notification is also to be provide to the Environmental Bureau Chief.

For a major release, a written notification is to be provided to the District 3 Office within 15 days after the release takes place. In addition, a copy of the written notice is to be provided to the Environmental Bureau for any release that may with reasonable probability be detrimental to water or cause an exceedance of the standards in 19 NMAC 15.1.19 B(1), B(2), or B(3). The written notification is to be completed and filed with OCD Form C-141.

A **minor release** is:

- A release in volume of greater than 5 barrels but not more than 25 barrels (excluding natural gases)
- A release of natural gases in volume greater than 50 mcf but less than 500 mcf

Within 15 days after a minor release occurs, a written notice is to be provided District Office. In addition, a copy of the written notice is to be provided to the Environmental

Bureau for any release that may with reasonable probability be detrimental to water or cause an exceedance of the standards in 19 NMAC 15.1.19 B(1), B(2), or B(3). The written notification is to be completed and filed with OCD Form C-141.

Section 1.6 – Employee Training

Training of personnel is conducted on an annual schedule. New employees receive oil spill prevention training prior to conducting any work related activity on a regulated facility. Content includes:

- Operation and maintenance of equipment;
- Spill prevention and response;
- Pollution regulations; and,
- SPCC Plan implementation.

Specific training items to be covered should include:

- What volume of fluid constitutes a "reportable" spill plus the rules and regulations regarding a spill?
- What are the early warning signs of possible spills (*e.g., rust area on external surfaces of production equipment; seepage deposits along bolted sections and around man-way covers on tanks, etc.*)?
- What operational functions may indicate a seepage or spill occurrence (e.g., loss of production, loss of fluid in tanks, etc.)?
- What should be reported, to whom and when?
- Review of containment and removal methods for spills on water and land.

All employees should be advised to contact all contract labor, landowners, etc., and request them to inform Western field or office personnel if they observe any leaks or potential problem areas on Western facilities.

Proper Employee Response

Personnel responding to a spill incident experience the greatest exposure risk. The hazards associated with spill response can be minimized by developing and maintaining an inventory of protective equipment, and establishing general guidelines and procedures for response actions.

If an individual is responding to a spill he or she should have available to them portable communication units and a thorough knowledge of personal protective equipment (PPE) limitations.

Protective clothing consisting of gloves, rubber boots, and coveralls may be sufficient to protect individuals responding to oil spills. If the lease where the oil spill has occurred has a history of hydrogen sulfide (H_2S), the Threshold Limit Value (TLV) should be determined before entering the area of the spill. If the TLV is found to exceed 20 ppm H2S then a work unit or self-contained (*30 minute*) rescue unit for breathing should be available, if greater than 100 ppm the equipment should be donned before entering the spill area *even if the spill is in progress.*

Section 1.7 – Facility Layout

The San Juan River Gas Plant includes natural gas treating and processing equipment. Specific equipment includes a cryogenic processing skid, a liquid stabilizer, compressors that are driven by reciprocating internal combustion engines, an amine treating unit, a sulfur recovery unit, and a dehydration unit. Produced water and condensate storage tanks are located on the northwest portion of the property. Natural gas liquid product tanks are located on the east side of the property. The site is relatively flat. Additional details are provided in Section 2.1.

Section 1.8 – Prevention, Response and Clean-up

Section 1.8.1 – Security

The facility is fenced with secured gates, buildings and storage areas. The facility is equipped with interior and exterior lighting. The facility is manned during business hours.

Loading/unloading connections are securely capped when not in service.

Section 1.8.2 – Oil Contingency Plan

The following actions should be implemented in the event of a spill, release, or discharge of oil and/or oil related products.

General Procedures

- Remove all potential ignition sources. DO NOT SMOKE!
- Unless the spill involves a known substance, assume the material is EXTREMELY HAZARDOUS.
- Restrict access and establish one upwind controlled point of entry to the spill area.
- DO NOT enter the spill area without assistance and proper Personal Protective Equipment (PPE).
- Implement the "Buddy" system.
- Establish a line of communication between persons entering the spill area and those outside.
- Approach the spill from the upwind direction.
- Limit contact with the spilled material, contaminated containers, debris, etc.
- If necessary, notify nearest source of medical aid. Inform medical personnel of extent of injuries, nature of spilled material, required PPE, decontamination procedures and any other pertinent information regarding the incident.

Determine the Source

- Determine the source of the spill and make every effort to stop it, if possible within safety constraints, while observing the previously mentioned precautionary steps.

Containment

- Contain the spill in the smallest area possible, or restrict from leaving the property, or restrict from entering navigable waters or an associated conveyance.

  - Methods of Containment on Water
    Booms – *Note:* Current speed and wave action are the limiting factors to the usage of booms. In rivers and streams when current speed limits the usage of conventional booms, the development of a deflection boom in calmer water downstream should be considered.
    - Curtain booms – used as permanent barrier in calm water.
    - Fence booms – light fence booms used in shallow waters and can be manually carried into areas inaccessible by conventional means; medium fence booms, which are heavier duty than light fence booms, used in fairly calm open water.
    - Tsang booms – used in rivers with drifting ice flows.
    - Sorbent booms – lightweight and composed of oleophillic-hydrophobic material and can be hand carried to remote spill areas.
    - Expedient booms – constructed of material readily available in the field, such as bales of hay, logs or other similar floatable sectioned material which can be secured end to end. To prevent the spill from escaping between the sections, sorbent material can be placed in front of the barrier.
    - Siphon dams – used to collect and contain a contaminant floating on a small stream. This technique is most effective in fairly slow currents where the water level fluctuation is not great. There are two types of these structures, the siphon and the T-siphon dams.
    - Filter fence – used to collect and contain oil spills in small streams and drainage ditches. Wire mesh is stretched across and anchored to bed and bank of the stream. Sorbent material is placed ahead of the spill and allowed to float down to the fence where the material is held in place to trap the contaminant. Bales of straw or hay can be used instead of the sorbent material if the stream is small enough.

  - Removal Methods on Water
    - Suction – Vacuum trucks have been most commonly used.
    - Mechanical skimmer – the skimmer can be sized to the spill.
    - Sorbent materials – can be placed on water to pick up spill and then removed with nets or rakes. There are disadvantages to using sorbent material that must be considered, such as the possibility of sinking if the material becomes water logged, become heavy due to recovery, can become windblown before saturation, are ineffective in fast currents and icy conditions, and are hampered by debris.

  - Methods of Containment on Land

    - To contain a spill in a small drainage area, an earthen dike or dam should be constructed to intercept and contain the spill. Installation of an outlet siphon or flow pipe should be considered to allow any existing or anticipated surface water to pass through the retaining structure. Below

the dike one should build a filter fence to capture any oil particles that may pass through the outlet pipe or siphon.

- Removal Methods on Land
  - Once the oil has been contained, removal can be accomplished generally by utilizing a vacuum truck. In special cases sorbent material may be required.
- Removal from Ground Water
  - In the event that a spill has resulted in or may be suspected to result in contaminating the groundwater there are three techniques which are accepted and must be approved by the State of New Mexico Oil Conservation Division.
    - Recovery Wells
    - Trenches and Ditches
    - Biodegradation

Clean-Up of a Spill and Disposal

Clean up of spills under the direction of the Operations Superintendent shall proceed in a timely and diligent manner. Releases will be addressed in accordance with a remediation plan submitted to and approved by the OCD or with an abatement plan submitted in accordance with 19 NMAC 15.1.19.

Manpower, Equipment and Material List

Onsite spill control equipment includes sorbent pads and granular material, drums, brooms, and shovels. As required, outside contractors may be used to contain and clean up releases.

Roustabout Service & Light Dirt Work Equipment

Industrial Mechanical, Inc.

(505) 325-5005

3030 La Plata Highway, Farmington, New Mexico

Vacuum Trucks

Riley Industrial Services, Inc.

(505) 327-4947

2415 San Juan Blvd., Farmington, New Mexico

Spill Review Meeting

After any spill has occurred, a spill review meeting will be held in conjunction with that month's safety meeting. This particular meeting's minutes should be recorded. The meeting should review:

- The cause of the spill.
- The remedial action taken.

- The work necessary to reduce the chances of any recurrence of the spill.
- The minutes should be kept on file at the San Juan River Gas Plant.

A clean-up inspection should be made prior to this meeting and the results discussed at the meeting.

1.9 Impracticability

Not applicable.

1.10 Deviations to Rule

The engine oil storage tank for compressor C-600 is lacking secondary containment.

There are no other deviations to applicable requirements of 40 CFR Part 112 at the San Juan River Gas Plant.

SECTION 2.0 – ONSHORE FACILITIES
Section 2.1 – Containers and Potential Release Analysis

Oil Source	Associated Substance (Contents) *(Oil)*	Source Capacity *(Gal)*	Potential Failure	Maximum Rate of Flow *(Gal/hr)*	Direction of Flow	Containment System(s)*
Aboveground Fixed Storage Containers						
TK-1	Produced Water and Condensate	16800	Leak, rupture, overfill	16800	Contained in dike	Earthen dikes
TK-2	Condensate	16800	Leak, rupture, overfill	16800	Contained in dike	Earthen dikes
TK-3	Produced Water	10500	Leak, rupture, overfill	10500	Contained in dike	Earthen dikes
TK-5	Diesel	300	Leak, rupture, transfer	300	Contained in dike	Concrete dike
TK-6	Gasoline	300	Leak, rupture, transfer	300	Contained in dike	Concrete dike
TK-7	Solvent	500	Leak, rupture, transfer	500	Contained in dike	Concrete dike
TK-11	Diethanolamine	44000	Leak, rupture, overfill	44000	Northwest	None
TK-14	Methanol	1000	Leak, rupture, transfer, overfill	1000	Contained in dike	Concrete dike
TK-8901	Used Oil	350	Leak, rupture, transfer, overfill	350	Contained in tank	Steel stock tank
TK-8902	Engine Oil	1000	Leak, rupture, transfer	1000	Contained in building	Building
C-600 Oil Tank	Engine Oil	500	Leak, rupture, transfer	500	North	None
T-3	Y-Grade	42000	Leak, rupture	42000	North	None
T-4	Y-Grade	42000	Leak, rupture	42000	North	None
T-5	Y-Grade	42000	Leak, rupture	42000	North	None
Lance Tank 1	Engine Oil	500	Leak, rupture, transfer	500	Contained in tank	Steel stock tank
Lance Tank 2	Engine Oil	350	Leak, rupture, transfer	350	Contained in tank	Steel stock tank
Lance Tank 3	Methanol	350	Leak, rupture, transfer	350	Contained in tank	Steel stock tank
Note: Lance Tanks 1, 2, and 3 are operated by Lance Oil & Gas, a subsidiary of WGR						
Completely and Partially Buried Tanks						
None						
Mobile and Portable Containers						
None						

Operational Equipment (Transformers, Manufacturing Equipment, Process Vessels, etc.)						
TO-1 (Pigged liquids receiver)	Pigged Liquids	14700	Leak, rupture	14700	North	Earth dike north of inlet liquids area
TO-2 (Surge tank)	Condensate	18000	Leak, rupture	18000	Contained in dike	Earth dike
TK-8 (Dehy overhead knockout)	Produced Water and Condensate	6000	Leak, rupture	6000	Contained in dike	Steel containment dike
T-13 (Slug catcher)	Produced Water and Condensate	100000	Leak, rupture	100000	North	None
TK-17 (Surge tank)	Glycol	840	Leak, rupture, overfill	840	Contained in steel tank	Steel tank
GV-500 (Surge tank)	Glycol	2244	Leak, rupture, overfill	2244	Contained in dike	Earth dike
V-4106 (Aneth suction scrubber)	Produced water	210	Leak, rupture	210	North	None
V-5102 (Aneth inlet scrubber)	Produced water	1190	Leak, rupture	1190	North	None
V-6 (Barker Dome inlet scrubber)	Produced water	1270	Leak, rupture	1270	North	None
V-5101 (Barker Dome suction scrubber)	Produced water	1190	Leak, rupture	1190	North	None
TK-13 (Flare knockout)	Produced water	3000	Leak, rupture	3000	North	None
Truck or Rail Loading/Unloading Rack						
Condensate and produced water loading	Condensate or produced water	16800	Transfer	16800	East	Earth berm
Y-grade loading	Y-grade	42000	Transfer	42000	South	Asphalt and concrete curb
Other Potential Spill Sources (Surface Impoundments, etc.)						
None						

Section 2.2 – Bulk Storage Containers

Container material, construction, and size are compatible with contents and quantity stored and the conditions of storage. Liquids stored at the facility are natural gas liquids, refined lubricating oils, and produced water. Containers are constructed of welded steel and painted to prevent corrosion.

With the exception of pressurized vessels, storage containers are provided with secondary containment. Exterior secondary containment structures are constructed so that a means of secondary containment is provided for the largest single container with

sufficient freeboard to contain precipitation. Earthen berms, concrete vaults, and buildings are sufficiently impervious to contain spills.

Visible discharges of oil, which result in a loss of material, are promptly corrected and any discharges of oil in secondary containment structures are promptly removed.

The produced water storage and condensate tanks are equipped with visual gages. Site personnel check fluid levels in bulk storage containers at least once per week, and more often as the fluid levels approach capacity. The capacities of the containers are sufficient to assure that they do not overflow between level checks.

Tanks used for the storage of new and used lubricating oils (engine, compressor) are equipped with visual gages. In order to prevent overflow, the gages are monitored when the tanks are filled.

Bulk storage containers are visually inspected on at least an annual basis. Inspections are to include container supports and foundations. In addition, personnel are trained to observe and report any signs of deterioration, discharge, or accumulation of oil in secondary containment structures during routine operations. Bulk storage containers are also subject to integrity testing. The frequency and type of testing will be suitable for the container size and design and will be performed in accordance with accepted industry standards. Testing techniques may include hydrostatic, radiographic, ultrasonic, acoustic, or another system of non-destructive shell testing. Records of integrity tests will be maintained at the San Juan River Gas Plant.

Section 2.3 – Facility Drainage

The southern portion of the facility generally grades to the south, while the northern portion of the facility generally grades to the north-northwest.

The main portion of the plant, including treating, processing, and compression facilities, is located on the northern portion of the site. The site is bounded on the north by an arroyo that flows northwest to a retention basin. Any large, uncontained releases from the facility would eventually flow to the retention basin. Flow from the basin is through a culvert that is equipped with a gate valve. The gate valve is closed unless water is intentionally released from the basin. At least once a month and prior to opening the gate valve, the basin is visibly inspected for the presence of hydrocarbons.

Section 2.4 – Partially and Completely Buried Tanks

The facility does not have partially or completely buried storage tanks. Process sumps are inspected and maintained in accordance with the facility Discharge Plan.

Section 2.5 – Mobile or Portable Oil Storage Containers

Mobile or portable oil storage containers are not located at the facility.

Section 2.6 – Internal Heating Coils

Internal heating coils may be used to heat produced water tanks. However, steam return and exhaust lines do not discharge into open watercourses or drainages. Therefore, potential leakage from defective internal heating coils is controlled.

Section 2.7 – Facility Loading/Unloading

Tank truck loading/unloading is limited to the following operations at the facility:

- Removal of produced water and condensate at the inlet liquids area
- Removal of Y-grade product from Tanks T-3, T-4, and T-5
- Removal of used oil from the used oil storage tank
- Filling of the tanks used for the storage of lubricating oil, diesel, methanol, solvent, tryethylene glycol, and amine

Tank car (rail) loading/unloading does not occur at the facility.

All entities involved in the loading/unloading of oil and/or oil related products at the facility are required to comply with applicable DOT regulations (49CFR177) and Western standard operating procedures. All drivers must be authorized and certified by Western to load/unload. Warning signs are located at loading/unloading stations addressing transfer line connection/disconnection. Drains and outlets on tank truck are checked for leakage before loading/unloading and departure. If necessary, drains and outlets are tightened or adjusted.

Section 2.8 – Piping

Buried steel piping that is installed or replaced on or after August 16, 2002 is provided with a protective wrapping or coating and cathodic protection. Buried lines that are exposed for any reason are carefully inspected for deterioration. If corrosion damage is discovered, additional examination and corrective will be implemented.

Leak testing of buried piping is conducted at the time of installation, modification, construction, relocation, or replacement.

Out of service piping terminal connections are capped or blank-flanged and marked.

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

Bumper guards are provided to ensure that vehicles do not endanger above ground piping or other oil transfer operations. Backing of vehicles is not allowed within the facility. Signs are provided to warn vehicles entering the facility that above ground piping and storage containers are present.

Section 2.9 – Inspections, Tests and Records

Areas of concern to be inspected are listed on the Facility inspection checklist (APPENDIX C). If changes have been made to the equipment at a particular facility,

please note the new or omitted equipment on the form. The following are items to be observed and noted during inspection activities.

General Information

- Frequency – Annually
- Inspector – Operations Superintendent or designee

Areas of Concern

- Storage Containers -This includes all aboveground and underground tanks and drums of petroleum and / or petroleum related products. All drums should be properly labeled and stored off ground surface. All empty drums and out-of-date chemicals should be removed from the facility and disposed of properly.
- Processing Equipment - If excessive rust or other signs of impending failure exist, make a note of it on the inspection report.
- Valves and Fittings - This includes aboveground valves and fittings that are visible from the ground level or other safe viewing points. Special attention should be given to those valves and fittings used to contain fluids in the containers listed above.
- Piping – Above ground piping should be inspected for any stress fractures or other signs of impending failure. Special attention should be given to that piping that is used to transfer fluids to the containers listed above.
- Secondary Containment - Dikes and / or other structures used to contain spills from process units or storage containers should be inspected to identify those needing repair or refurbishing.

Inspection Techniques

- Check for stained soils and standing liquids around equipment. Note any of these situations on the inspection report. Attempt to locate the source of any leaks and take steps to stop the leak or clean up the liquid with absorbent materials.
- Note any unusual sounds such as high-pitched whistling which may indicate a small leak in process equipment and/or valves and fittings.
- Be aware of and note any unusual odors.

Conducting the Inspection

- In any inspection, particular attention must be given to areas that have experienced spills in the past. A review of these spills and the circumstances surrounding them should be made prior to the inspection so the inspector is completely familiar with potential problem areas. While conducting the inspection, it should be noted if any repairs were made of a temporary nature or were permanent and if adequate provisions were taken to reduce the chances of re-occurrence and if clean-up procedures have been completed.
- Records of inspections will be made part of this SPCC Plan and maintained for a period of three years.

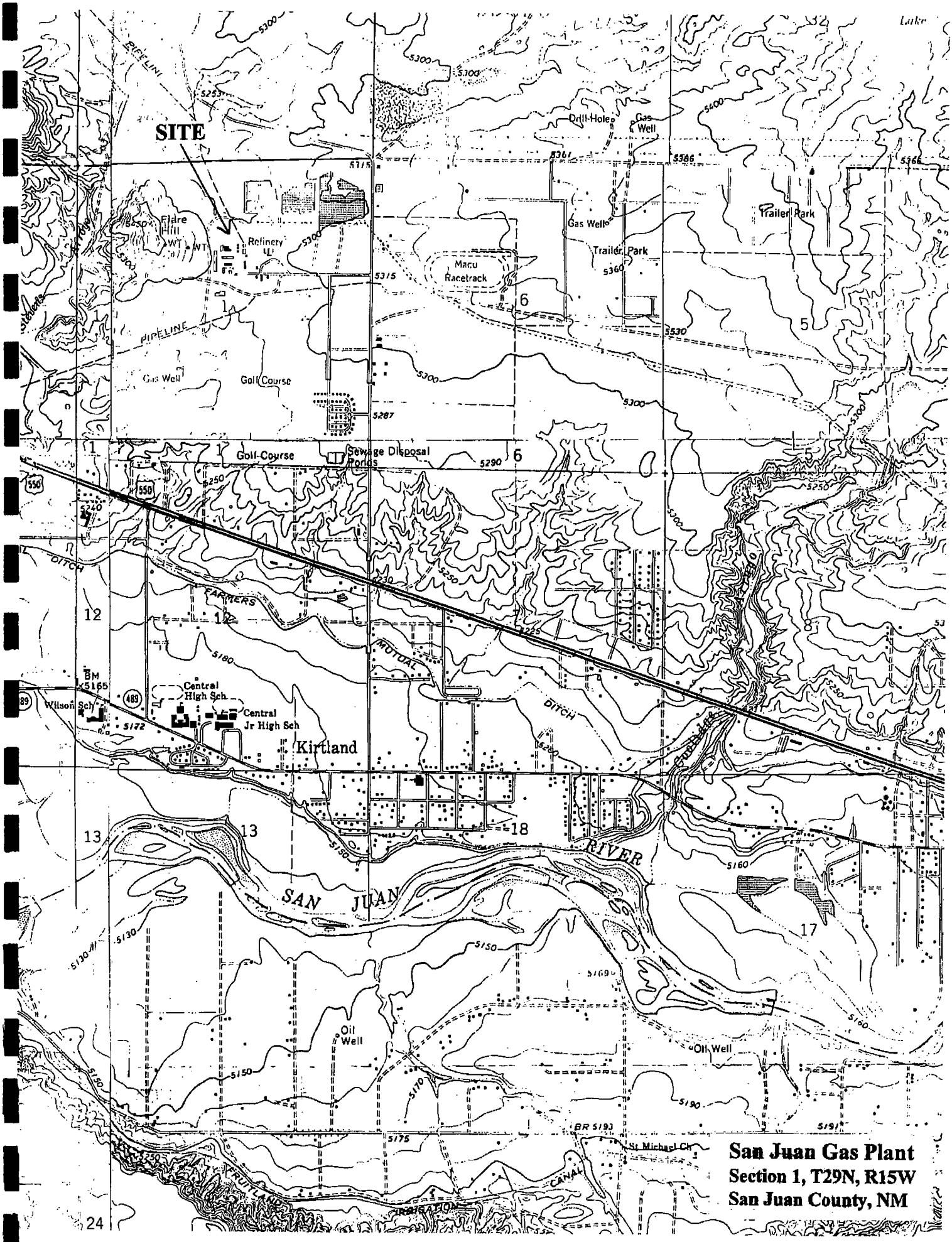
In addition to the procedures presented, individual areas may require unscheduled inspection. These may include, but are not limited to:

- Inspection of an area of a spill after the spill but prior to a review meeting.
- Inspection of new or replacement equipment soon after it is installed to insure correct operations.
- Inspection of an area that has had numerous minor leaks with particular attention to areas that may need repairs or replacements.
- Inspection of a problem area to see whether additional containment or alternate diversionary equipment is needed.

Section 2.10 – Brittle Fracture Evaluation

If a field-constructed aboveground container undergoes a repair, alteration, reconstruction, or a change in service that might affect the risk of a discharge or failure due to brittle fracture or other catastrophe, the container will be evaluated for risk of discharge or failure. Evaluation techniques are described in Section 2.2. As necessary, appropriate actions to prevent discharge or failure will be implemented.

APPENDIX A
SITE LOCATION MAP



San Juan Gas Plant
Section 1, T29N, R15W
San Juan County, NM

APPENDIX B
SITE LAYOUT/DIRECTION OF FLOW

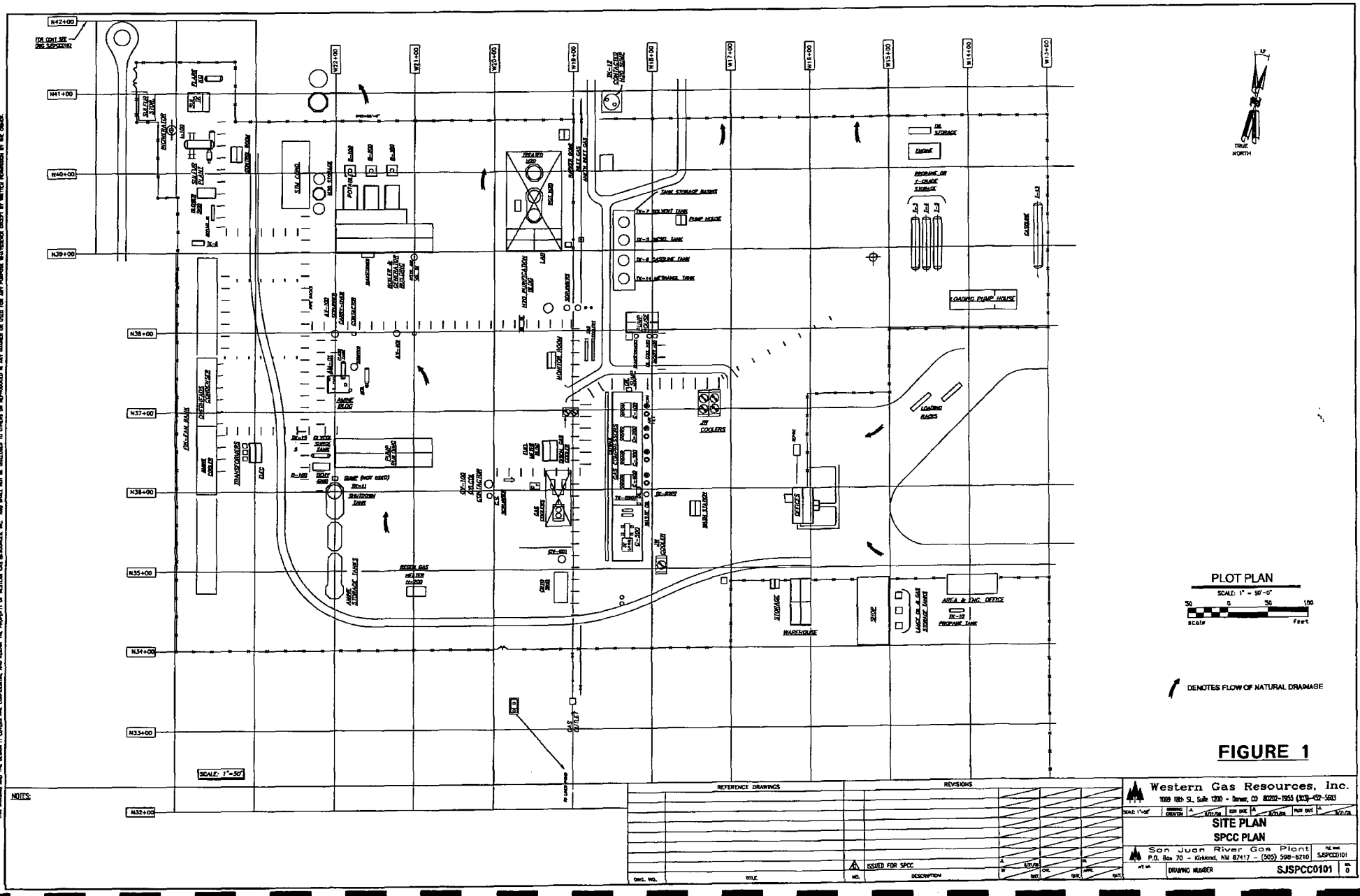


FIGURE 1

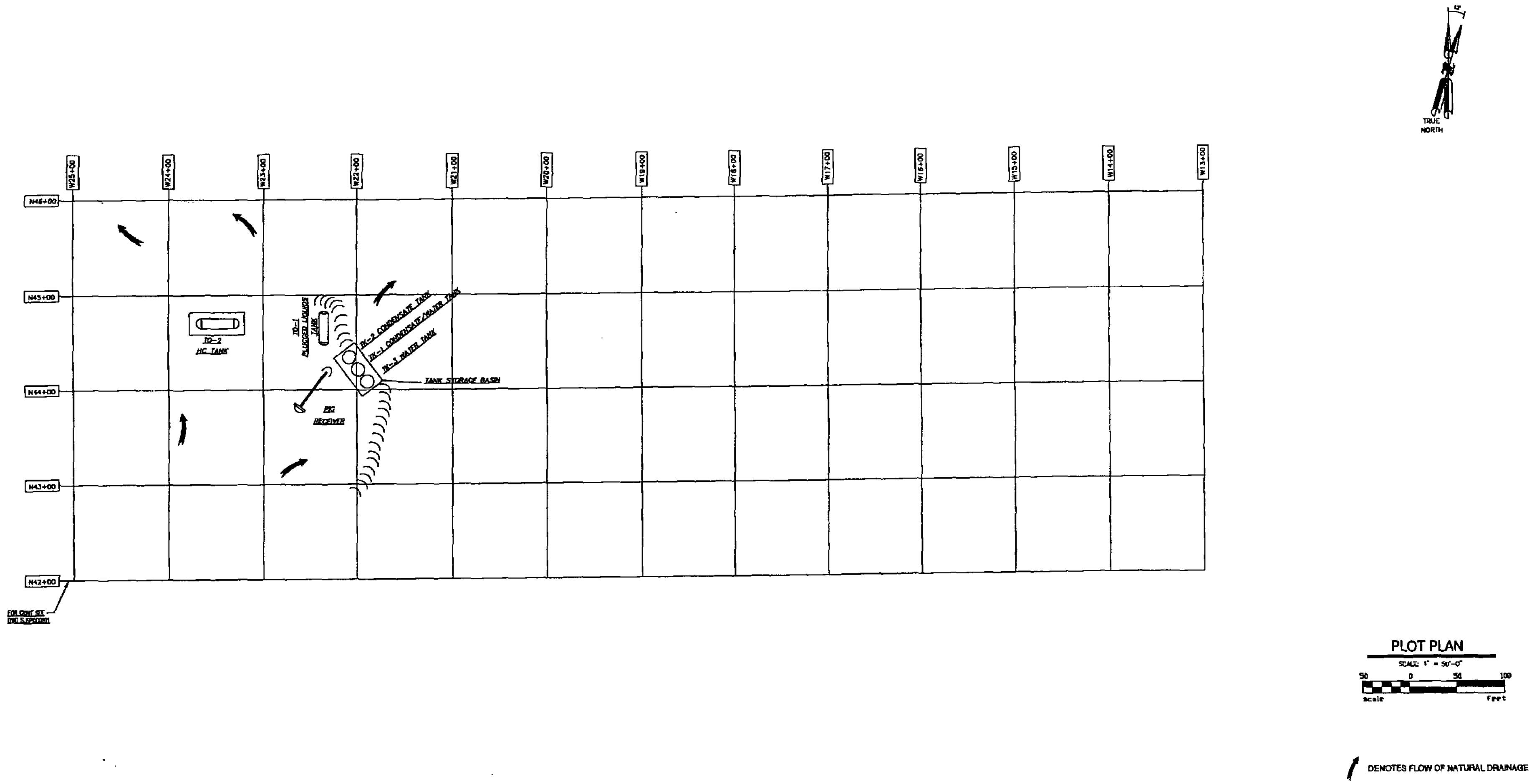


FIGURE 2

NOTES:

REFERENCE DRAWINGS		REVISIONS						
		A	ISSUED FOR SPCC					
DWG. NO.	TITLE	NO.	DESCRIPTION	BY	CHK	DATE	APPR	DATE

Western Gas Resources, Inc.
1099 18th St., Suite 1200 - Denver, CO 80202-1955 (303)-452-5603

SCALE: 1"=50'

SITE PLAN
SPCC PLAN

San Juan River Gas Plant
P.O. Box 70 - Kirtland, NM 87417 - (505) 598-6210

FILE NAME: SJSPCC0102

DRAWING NUMBER **SJSPCC0102** REV 0

APPENDIX C
SPILL REPORT FORM
OCD FORM C-141
FACILITY INSPECTION CHECKLIST

SPILL REPORT FORM

The Facility will utilize the following form to relate information in the event of a discharge:

Date: _____ *Time:* _____

INCIDENT DESCRIPTION

Reporter's Full Name: _____ *Position:* _____
Day Phone Number: _____ *Evening Phone Number:* _____
Company: _____ *Organization Type:* _____
Facility Address: _____ *Owner's Address:* _____
_____ _____
_____ _____
_____ _____
Facility Latitude: _____ *Facility Longitude:* _____
Spill Location: _____
(if not at Facility) _____
Responsible Party's Name: _____ *Phone Number:* _____
Responsible Party's Address: _____
Source and/or cause of discharge: _____
_____
_____
Nearest City: _____
County: _____ *State:* _____ *Zip code:* _____
Section: _____ *Township:* _____ *Range:* _____ *County:* _____
Distance from City: _____ *Direction from City:* _____
Container Type: _____ *Container Storage Capacity:* _____
Facility Oil Storage Capacity: _____
Material:

Total Quantity Released	Water Impact (*YES or NO*)	Quantity into Water

RESPONSE ACTION(S)

Action(s) taken to Correct, Control, or Mitigate Incident: _____
_____
_____
Number of Injuries: _____ *Number of Deaths:* _____
Evacuation(s): _____ *Number Evacuated:* _____
Damage Estimate: _____
More information about impacted medium: _____
_____

CALLER NOTIFICATIONS

National Response Center (NRC): 1-800-424-8802
Additional Notifications (Circle all applicable): *State* *Other*

ADDITIONAL INFORMATION

Any information about the incident not recorded elsewhere in this report: _____
_____
_____

NOTE: DO NOT DELAY NOTIFICATION PENDING COLLECTION OF ALL INFORMATION.

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

Form C-141
Revised October 10, 2003

Submit 2 Copies to appropriate District Office in accordance with Rule 116 on back side of form

Release Notification and Corrective Action

OPERATOR

☐ Initial Report ☐ Final Report

Name of Company	Contact
Address	Telephone No.
Facility Name	Facility Type

Surface Owner	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County

Latitude_____ **Longitude**_____

NATURE OF RELEASE

Type of Release	Volume of Release	Volume Recovered
Source of Release	Date and Hour of Occurrence	Date and Hour of Discovery
Was Immediate Notice Given? ☐ Yes ☐ No ☐ Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? ☐ Yes ☐ No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*

Describe Area Affected and Cleanup Action Taken.*

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Signature:	OIL CONSERVATION DIVISION	
Printed Name:	Approved by District Supervisor:	
Title:	Approval Date:	Expiration Date:
E-mail Address:	Conditions of Approval:	Attached ☐
Date: Phone:		

* Attach Additional Sheets If Necessary

WESTERN GAS RESOURCES, INC.
SPCC INSPECTION FORM

FACILITY NAME:	
DATE OF INSPECTION (MO/DAY/YR):	
INSPECTED BY:	

Are dikes/berms in good physical condition and capable of containing 110 percent of the capacity of the single largest tank? Specify what, if any, improvements are necessary.	_____ Yes _____ No	
Inspect valves and fittings for leakage. Are any valves/fittings found to be leaking? If yes, specify what impacts have occurred to ground surface. Also specify repair schedule.	_____ Yes _____ No	
Inspect catch basins, ponds, lagoons and diversion structures for integrity. Are facilities functioning as designed or intended? Comment on presence of oil and water in facilities and specify schedule for removal.	_____ Yes _____ No _____ N/A	
Inspect tanks and other vessels for leakage. Are there any indications of leakage or overflow? Provide specifics on leakage or overflow and schedule for repair.	_____ Yes _____ No	
Is cathodic protection in good condition and operating properly? If not, describe problems detected and provide schedule for repair.	_____ Yes _____ No _____ N/A	
Inspect grounding stations/connections for integrity. Is grounding station(s) in good condition? Specify what, if any, repairs need to be made.	_____ Yes _____ No _____ N/A	
Check high level alarms and liquid level sensors and gauges for proper operation. Are alarms and sensors functioning properly? Indicate any problems encountered.	_____ Yes _____ No _____ N/A	
Inspect pipe supports. Is piping adequately supported? Specify any improvements to pipe supports that are necessary.	_____ Yes _____ No _____ N/A	

Inspect drainage ways and ditches for the presence of hydrocarbon liquids, glycols, oils, etc. Are there any fluids other than water present in drainages and ditches or any discolored soils that may indicate previous impacts?	____ Yes ____ No	
Inspect warning signs, tank labels, and protective barriers. Are signs, labels and barriers in good physical condition and highly visible?	____ Yes ____ No	
Do transporters have up-to-date loading and unloading procedures that are being followed? Specify whose procedures are being used and where the procedures are located.	____ Yes ____ No	
Is tank heating system functioning properly? If not, specify necessary repairs and provide schedule.	____ Yes ____ No ____ N/A	
Have there been any activities resulting in the exposure of buried piping? If yes, comment on the condition of the piping, pipe wrap, coating, etc.	____ Yes ____ No	
Are site fencing, gates and lighting in good condition? If not, specify repairs required and provide schedule.	____ Yes ____ No ____ N/A	
Have drainage event inspections been recorded on the reporting form in the SPCC plan? Compliance with SPCC regulations requires accurate record keeping.	____ Yes ____ No ____ N/A	

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

April 3, 2007

Kent M. Weissling
Anadarko/Western Gas Resources Inc.
P.O. Box 1330
Houston, Texas 77251-1330

Re: Discharge Permit GW-033
Western Gas Resources, Inc.
San Juan River Gas Plant
San Juan County, New Mexico

Dear Mr. Weissling:

Pursuant to Water Quality Control Commission (WQCC) Regulations 20.6.2.3000 - 20.6.2.3114 NMAC, the Oil Conservation Division (OCD) hereby approves the discharge permit for the Western Gas Resources, Inc San Juan Gas Plant GW-033 located in Section 1, Township 29 North, Range 15 West, NMPM, San Juan County, New Mexico, under the conditions specified in the enclosed **Attachment To The Discharge Permit**. Enclosed are two copies of the conditions of approval. **Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe Office within 30 working days of receipt of this letter including permit fees.**

Please be advised that approval of this permit does not relieve the owner/operator of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does approval of the permit relieve the owner/operator of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If you have any questions, please contact Leonard Lowe of my staff at (505-476-3492) or E-mail leonard.lowe@state.nm.us. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Wayne Price
Environmental Bureau Chief

LWP/lrl
Attachments-1
xc: OCD District Office

ATTACHMENT TO THE DISCHARGE PERMIT
WESTERN GAS RESOURCES, INC. SAN JUAN GAS PLANT (GW-033)
DISCHARGE PERMIT APPROVAL CONDITIONS
April 3, 2007

Please remit a check for $4000.00 made payable to Water Quality Management Fund:

Water Quality Management Fund
C/o: Oil Conservation Division
1220 S. Saint Francis Drive
Santa Fe, New Mexico 87505

1. **Payment of Discharge Plan Fees:** All discharge permits are subject to WQCC Regulations. Every billable facility that submits a discharge permit application will be assessed a filing fee of $100.00, plus a renewal flat fee (*see* WQCC Regulation 20.6.2.3114 NMAC). The Oil Conservation Division ("OCD") has received the required $100.00 filing fee. However, the owner/operator still owes the required $4000.00 renewal permit fee for a gas processing plant.

2. **Permit Expiration and Renewal:** Pursuant to WQCC Regulation 20.6.2.3109.H.4 NMAC, this permit is valid for a period of five years. **The permit will expire on December 29, 2011** and an application for renewal should be submitted no later than 120 days before that expiration date. Pursuant to WQCC Regulation 20.6.2.3106.F NMAC, if a discharger submits a discharge permit renewal application at least 120 days before the discharge permit expires and is in compliance with the approved permit, then the existing discharge permit will not expire until the application for renewal has been approved or disapproved.

3. **Permit Terms and Conditions:** Pursuant to WQCC Regulation 20.6.2.3104 NMAC, when a permit has been issued, the owner/operator must ensure that all discharges shall be consistent with the terms and conditions of the permit. In addition, all facilities shall abide by the applicable rules and regulations administered by the OCD pursuant to the Oil and Gas Act, NMSA 1978, Sections 70-2-1 through 70-2-38.

4. **Owner/Operator Commitments:** The owner/operator shall abide by all commitments submitted in its August 30th, 2006 discharge plan renewal application, including attachments and subsequent amendments and these conditions for approval. Permit applications that reference previously approved plans on file with the division shall be incorporated in this permit and the owner/operator shall abide by all previous commitments of such plans and these conditions for approval.

5. **Modifications:** WQCC Regulation 20.6.2.3107.C, and 20.6.2.3109 NMAC addresses possible future modifications of a permit. The owner/operator (discharger) shall notify the OCD of any facility expansion, production increase or process modification that would result in any significant modification in the discharge of water contaminants. The Division Director may require a permit modification if any water quality standard specified at 20.6.2.3103 NMAC is being or will be exceeded, or if a toxic pollutant as defined in WQCC Regulation 20.6.2.7 NMAC is present in ground water at any place of withdrawal for present or reasonably foreseeable future use, or that the Water Quality Standards for Interstate and Intrastate streams as specified in 20.6.4 NMAC are being or may be violated in surface water in New Mexico.

6. **Waste Disposal and Storage:** The owner/operator shall dispose of all wastes at an OCD-approved facility. Only oil field RCRA-exempt wastes may be disposed of by injection in a Class II well. RCRA non-hazardous, non-exempt oil field wastes may be disposed of at an OCD-approved facility upon proper waste determination pursuant to 40 CFR Part 261. Any waste stream that is not listed in the discharge permit application must be approved by the OCD on a case-by-case basis.

A. **OCD Rule 712 Waste:** Pursuant to OCD Rule 712 (19.15.9.712 NMAC) disposal of certain non-domestic waste without notification to the OCD is allowed at NMED permitted solid waste facilities if the waste stream has been identified in the discharge permit and existing process knowledge of the waste stream does not change.

B. **Waste Storage:** The owner/operator shall store all waste in an impermeable bermed area, except waste generated during emergency response operations for up to 72 hours. All waste storage areas shall be identified in the discharge permit application. Any waste storage area not identified in the permit shall be approved on a case-by-case basis only. The owner/operator shall not store oil field waste on-site for more than 180 days unless approved by the OCD.

7. **Drum Storage:** The owner/operator must store all drums, including empty drums, containing materials other than fresh water on an impermeable pad with curbing. The owner/operator must store empty drums on their sides with the bungs in place and lined up on a horizontal plane. The owner/operator must store chemicals in other containers, such as tote tanks, sacks, or buckets on an impermeable pad with curbing.

8. **Process, Maintenance and Yard Areas:** The owner/operator shall either pave and curb or have some type of spill collection device incorporated into the design at all process, maintenance, and yard areas which show evidence that water contaminants from releases, leaks and spills have reached the ground surface.

9. Above Ground Tanks: The owner/operator shall ensure that all aboveground tanks have impermeable secondary containment (e.g., liners and berms), which will contain a volume of at least one-third greater than the total volume of the largest tank or all interconnected tanks. The owner/operator shall retrofit all existing tanks before discharge permit renewal. Tanks that contain fresh water or fluids that are gases at atmospheric temperature and pressure are exempt from this condition.

10. Labeling: The owner/operator shall clearly label all tanks, drums, and containers to identify their contents and other emergency notification information. The owner/operator may use a tank code numbering system, which is incorporated into their emergency response plans.

11. Below-Grade Tanks/Sumps and Pits/Ponds.

A. All below-grade tanks and sumps must be approved by the OCD prior to installation and must incorporate secondary containment with leak detection into the design. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal. All existing below-grade tanks and sumps without secondary containment and leak detection must be tested annually or as specified herein. Systems that have secondary containment with leak detection shall have a monthly inspection of the leak detection system to determine if the primary containment is leaking. Small sumps or depressions in secondary containment systems used to facilitate fluid removal are exempt from these requirements if fluids are removed within 72 hours.

B. All pits and ponds, including modifications and retrofits, shall be designed by a certified registered professional engineer and approved by the OCD prior to installation. In general, all pits or ponds shall have approved hydrologic and geologic reports, location, foundation, liners, and secondary containment with leak detection, monitoring and closure plans. All pits or ponds shall be designed, constructed and operated so as to contain liquids and solids in a manner that will protect fresh water, public health, safety and the environment for the foreseeable future. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal.

C. The owner/operator shall ensure that all exposed pits, including lined pits and open top tanks (8 feet in diameter or larger) shall be fenced, screened, netted, or otherwise rendered non-hazardous to wildlife, including migratory birds.

D. The owner/operator shall maintain the results of tests and inspections at the facility covered by this discharge permit and available for OCD inspection. The owner/operator shall report the discovery of any system which is found to be leaking or has lost integrity to the OCD within 15 days. The owner/operator may propose various methods for testing such as pressure testing to 3 pounds per square inch greater than normal operating pressure and/or visual inspection of cleaned tanks and/or sumps, or other OCD-approved methods. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

12. Underground Process/Wastewater Lines:

A. The owner/operator shall test all underground process/wastewater pipelines at least once every five (5) years to demonstrate their mechanical integrity, except lines containing fresh water or fluids that are gases at atmospheric temperature and pressure. Pressure rated pipe shall be tested by pressuring up to one and one-half times the normal operating pressure, if possible, or for atmospheric drain systems, to 3 pounds per square inch greater than normal operating pressure, and pressure held for a minimum of 30 minutes with no more than a 1% loss/gain in pressure. The owner/operator may use other methods for testing if approved by the OCD.

B. The owner/operator shall maintain underground process and wastewater pipeline schematic diagrams or plans showing all drains, vents, risers, valves, underground piping, pipe type, rating, size, and approximate location. All new underground piping must be approved by the OCD prior to installation. The owner/operator shall report any leaks or loss of integrity to the OCD within 15 days of discovery. The owner/operator shall maintain the results of all tests at the facility covered by this discharge permit and they shall be available for OCD inspection. The owner/operator shall notify the OCD at least 72 hours prior to all testing.

13. Class V Wells: The owner/operator shall close all Class V wells (e.g., septic systems, leach fields, dry wells, etc.) that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes unless it can be demonstrated that ground water will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD-regulated facilities that 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 (NMED).

14. Housekeeping: The owner/operator shall inspect all systems designed for spill collection/prevention and leak detection at least monthly to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices shall be emptied of fluids within 72 hours of discovery. The owner/operator shall maintain all records at the facility and available for OCD inspection.

15. Spill Reporting: The owner/operator shall report all unauthorized discharges, spills, leaks and releases and conduct corrective action pursuant to WQCC Regulation 20.5.12.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC). The owner/operator shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days.

16. OCD Inspections: The OCD may place additional requirements on the facility and modify the permit conditions based on OCD inspections. As a result of OCD's inspection on January 7, 2007 Western Gas Resources, Inc. shall address the issues noted during the inspection listed below and comply by January 7, 2008.

A. Netting covering the pond should be checked after any major weather changes (i.e. snow storm, wind storms, etc.) to ensure the integrity of its function. (Photo 1 & Photo 2.)

B. Used activated alumni need to have a defined area to be placed other than directly on the ground (i.e. concrete area) (Photo 4).
C. Basic housekeeping needs a little work: Removing vegetation in and around Evap. Pond, (Photo 3), removing debris from liners around tanks (Photo 5). Debris may tear liners. Properly adjust liners currently in use (Photo 6).
D. Shop drum storage area. Barrels need to be properly stored and identified. This was noted in the 2001 inspection.
E. Larger secondary containment needs to be placed for product tanks near drum storage area (Photo 8).

17. Storm Water: The owner/operator shall implement and maintain run-on and runoff plans and controls. The owner/operator shall not discharge any water contaminant that exceeds the WQCC standards specified in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) including any oil sheen in any stormwater run-off. The owner/operator shall notify the OCD within 24 hours of discovery of any releases and shall take immediate corrective action(s) to stop the discharge.

18. Unauthorized Discharges: The owner/operator shall not allow or cause water pollution, discharge or release of any water contaminant that exceeds the WQCC standards listed in 20.6.2.3101 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams) unless specifically listed in the permit application and approved herein. ***An unauthorized discharge is a violation of this permit.***

19. Vadose Zone and Water Pollution: The owner/operator shall address any contamination through the discharge permit process or pursuant to WQCC 20.6.2.4000-.4116 NMAC (Prevention and Abatement of Water Pollution). The OCD may require the owner/operator to modify its permit for investigation, remediation, abatement, and monitoring requirements for any vadose zone or water pollution. Failure to perform any required investigation, remediation, abatement and submit subsequent reports will be a violation of the permit.

20. Additional Site Specific Conditions:

21. Transfer of Discharge Permit (WQCC 20.6.2.3111) Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of a facility with a discharge permit, the transferror shall notify the transferee in writing of the existence of the discharge permit, and shall deliver or send by certified mail to the department a copy of such written notification, together with a certification or other proof that such notification has in fact been received by the transferee.
Upon receipt of such notification, the transferee shall have the duty to inquire into all of the provisions and requirements contained in such discharge permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the department's file or files concerning such discharge permit. The transferee (new owner/operator) shall sign and return an original copy of these permit conditions and provide a written commitment to comply with the terms and conditions of the previously approved discharge permit.

22. Closure: The owner/operator shall notify the OCD when operations of the facility are to be discontinued for a period in excess of six months. Prior to closure of the facility, the operator shall submit a closure plan for approval. Closure and waste disposal shall be in accordance with the statutes, rules and regulations in effect at the time of closure.

23. Certification: Western Gas Resources, Inc., (Owner/Operator), by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained here. **Owner/Operator** further acknowledges that the OCD may, for good cause shown, as necessary to protect fresh water, public health, safety, and the environment, change the conditions and requirements of this permit administratively.

Conditions accepted by: "I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment."

_____
Company Name-print name above

_____
Company Representative- print name

_____
Company Representative- signature

Title_____

Date:_____

Western Gas Resources, Inc.

December 15, 2005

Mr. Wayne Price
New Mexico Energy, Minerals, and Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: Discharge Plan Renewal GW-033
San Juan River Gas Plant
San Juan County, New Mexico

Dear Mr. Price:

In accordance with Discharge Plan Approval Condition 8, Western Gas Resources, Inc. (WGR) has performed inspections of below grade sumps at the San Juan River Gas Plant. The results of those inspections are enclosed with this letter. WGR inspected five sumps at the San Juan River Gas Plant, all of which were found to be in good condition, with no evidence of leaks or damage. A sixth sump, located at the treating plant, has been out of service since June 2002.

If you have any questions or require additional information concerning this matter, please contact me at (303) 252-6237.

Sincerely,

Ronald R. LePlatt, P.E.
Sr. Environmental Engineer

Cc: K. McEvers, D. Anderson, M. Brinkmeyer, B. Portz, R. McClain

Mr. Denny Faust
Oil Conservation Division – District 3
1000 Rio Brazos Road
Aztec, New Mexico 87410

SAN JUAN RIVER PLANT

SUMPS

1. Boiler House — Location: South East corner of building in the basement.

2. Treating Plant — Location: Inside building, north side of building in floor. (Out of Service)

3. Amine Sump — Location: South of treating plant by south west doors.

4. Filter Drain Sump — Location : West of control room.

5. Compressor Sump. — Location: Dog house north end of compressor building outside.

6. Contact Water Sump. — Location: By #6 down hole.

2005
Sump Inspection

Treating Plant

July 8, 2005

Location: Treating Plant North side of building.
Sump is no longer needed.
(Out of Service)

The sump was filled with dirt and compacted on June 12, 2002. The I.M.I. crew poured concrete above the fill dirt to seal the sump. All other lines were filled with concrete.

Robert McClain

Sump Inspection

Amine Sump

July 26, 2005

Location: South of the Treating Plant by the South West doors.

The Amine sump is made of steel. The Amine sump was pumped down as low as it could be. An oil field suction truck was used to pump the sump out. The sump was cleaned. The walls and the floor were cleaned. I went in to the sump and made the inspection. I inspected the walls and the floor. Every thing looked to be in good shape. I made an inspection of the welds. All welds looked to be in good shape. I found no sign of cracks or breaks in the metal. The inspection was a hands on and visual. An Industrial Scientific multi –gas monitor model M40 was used to check the sump. A flammable gas test, 02 oxygen test, and a toxic gas test was performed before, and during the inspection.

Flammable Gas Test LEL %

Times	Readings
8:15 A.M.	0
8:20 A.M.	0
8:40 A.M.	0

02 Oxygen Test

Times	Readings
8:15 A.M.	20.9 %
8:20 A.M.	20.9 %
8:40 A.M.	20.9 %

Toxic Gas Test

Times	Readings
8:15 A.M.	0
8:20 A.M.	0
8:40 A.M.	0

Robert McClain

Sump Inspection

Filter / Storm Drain Sump July 26, 2005

Location: Sump is by Operators Station West of Control Room

This sump is made of concrete. The sump was drained. The sump was cleaned and vacuumed out. The sump is made of two sections. I made a visual and hands on inspection of this sump. All the walls of the sump looked to be in good shape. I found no sign of cracks or breaks in the concrete. The center or middle section was showing some ware on the top part of the wall. The sump looked to be solid and sound. I found no sign of leaking between the section walls. This sump has a 6" drain line.

Robert McClain

2005
Sump Inspection

Compressor Sump

July 8, 2005

Location: North End of Compressor Building.
Inside Dog House

The doghouse was removed. The sump is made of concrete. The sump was pumped down and cleaned. A visual and hands on inspection was made. I found no sign of crack or breaks in the concrete. The sump looked to be solid and in very good shape.

Robert M. McClain

Sump Inspection

Contact Water Sump. July 26, 2005

Location: North of Lab Building by # 6 Down Hole.

This sump is made of 3 steel tanks in to one tank. The sump has a liner. There is a down hole inspection pipe. A sample is taken Monthly and the findings are recorded. All records are recorded in the Plant Spill Prevention Control and Counter Measure Leak Detection (SPCC) book. The sump lids were removed. The Tanks were ventilated before the inspection was made. The sump pump was put on and most all liquids were pumped to the plant inlet. An oil field vacuum truck was used to remove all other liquids in the tanks. The tanks were cleaned. All liquids were vacuumed from the tanks. An Industrial Scientific multi-gas monitor model M40 used to test the tanks. A flammable gas test, 02 Oxygen test, and a toxic gas test were made. These test were done before, and during the work and the inspections.

Flammable Gas Test LEL %

Times	Readings
10:00 A.M.	0
10:35 A.M.	0
12:15 P.M.	0
1:00 P.M.	0

02 Oxygen Test

Times	Readings
10:00 A.M.	20.9
10:35 A.M.	20.9
12:15 P.M.	20.9
1:00 P.M.	20.9

Toxic Gas Test

Times	Readings
10:00 A.M.	0
10:35 A.M.	0
12:15 PM.	0
1:00 P.M.	0

I went in to the sump. I made a visual and hands on inspection of the sump. I found the metal to be in good shape. I found no sign of cracks or breaks in the metal.

Sump Inspection

Contact Water Sump

The welds all looked to be solid and in very good shape. The floor was in good shape and the walls were in good shape. Everything looked good.

Robert McClain

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 3/5/02

or cash received on _____ in the amount of $ 4000

from WESTERN GAS RESOURCES, INC.

for SAN JUAN RIVER GAS PLANT GW-033

Submitted by: (Facility Name) WAYNE PRICE (DP No.) Date: 3/14/02

Submitted to ASD by: _____ Date: "

Received in ASD by: _____ Date: _____

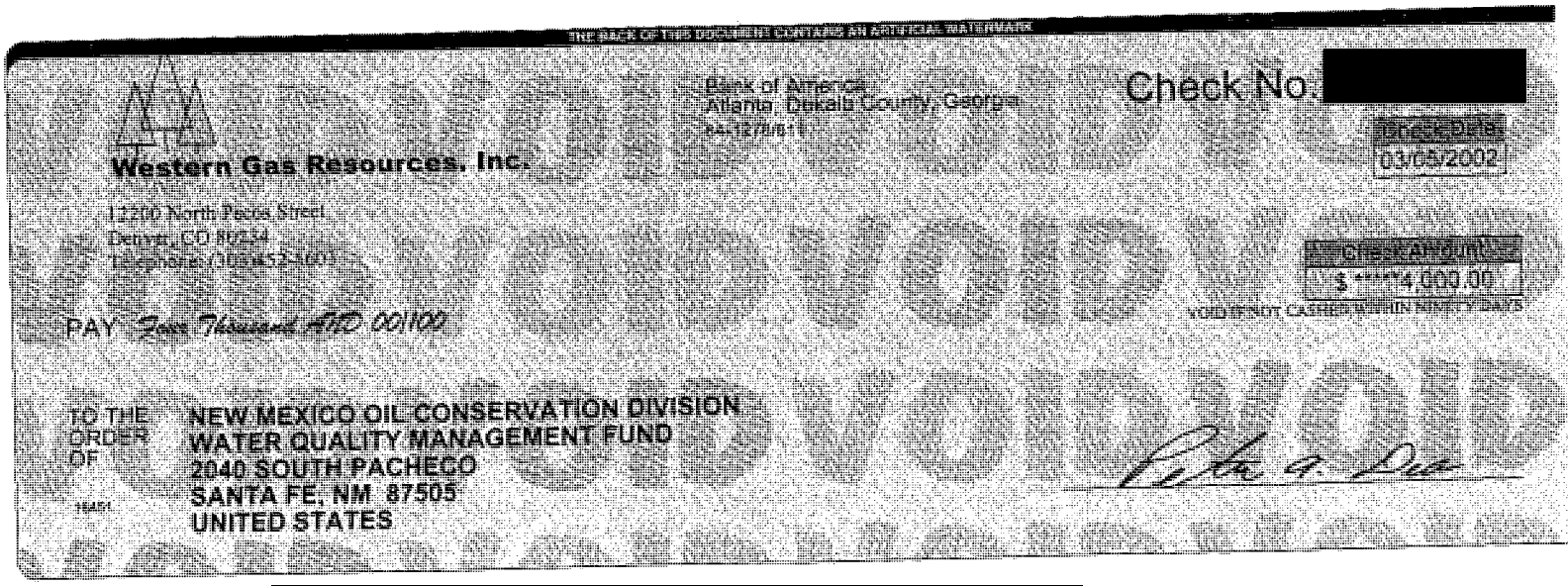
Filing Fee ___ New Facility ___ Renewal X

Modification ___ Other _____ (specify)

Organization Code 521.07 Applicable FY 2002

To be deposited in the Water Quality Management Fund.

Full Payment X or Annual Increment ___



[redacted]

Western Gas Resources, Inc.

March 8, 2002

Mr. Wayne Price
New Mexico Energy, Minerals, and Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: Discharge Plan Renewal GW-033

Dear Mr. Price:

Enclosed with this letter is a signed copy of the Conditions of Approval for the San Juan River Gas Plant Discharge Plan. A check in the amount of $4000.00 for the gas processing plant flat fee is also enclosed with this letter.

Per our telephone conversation of March 7, I am providing written clarification of two issues. First, Conditions 4 and 5, which concern containment of storage tanks, do not apply to pressurized storage tanks. Second, Condition 9, which concerns testing of underground process and wastewater pipelines, does not apply to gas-phase pipelines.

Thank you for your cooperation and effort during the renewal process and for taking time to visit the San Juan River Gas Plant. If you have any questions concerning the plant or plan, please contact me at (303) 252-6237.

Sincerely,

Ronald R. LePlatt
Sr. Environmental Engineer

Cc: K. McEvers, D. Anderson, M. Brinkmeyer, B. Portz, G. Burchell

12200 N. Pecos Street • Denver, Colorado 80234-3439 • (303) 452-5603

Price, Wayne

From: Ron LePlatt [RIeplatt@westerngas.com]
Sent: Friday, January 04, 2002 2:23 PM
To: WPrice@state.nm.us
Cc: dfoust@state.nm.us; Bruce Portz; Don Anderson; Kent McEvers
Subject: San Juan River Gas Plant - Addendum to Discharge Plan

Wayne, as we discussed during your visit to the San Juan River Gas Plant, below is a list of OCD Rule 712 wastes and their testing requirements.

The following wastes are generated on a routine basis:

Amine cartridge filters - BTEX compounds
Glycol cartridge filters - BTEX compounds
Activated carbon - TPH and BTEX compounds
Gas condensate filters - BTEX
Waste oil filters (engine and cryogenic skid) - TCLP metals
Barrels, drums, 5-gallon buckets, and 1-gallon containers that are empty and EPA-clean - no testing requirement
Office trash - no testing requirement
Paper and plastic bags that are empty - no testing requirement
Dry soiled rags and gloves - Paint filter test (if not dry)

The following wastes are generated on a non-routine basis:

Activated alumna (existing waste piles) - TPH and BTEX
Molecular sieve (existing waste piles) - TPH and BTEX
Junked pipes, valves, and metal equipment - NORM
Pipe scale and other deposits removed from pipeline and equipment - TPH, TCLP metals, NORM
Uncontaminated construction debris - no testing requirement
Non-friable asbestos and asbestos contaminated waste material - no testing requirement

The following D.(3) wastes are generated on a non-routine basis:

Contaminated soil other than petroleum contaminated soil
Petroleum contaminated soil
Spilled elemental sulfur (currently tested for TCLP metals)
Demolition debris not otherwise specified (existing cooling tower wood debris)
Other wastes as applicable (includes mole sieve dust filters and cryogenic skid inlet gas filters)

Western Gas Resources, Inc. will fulfill testing requirements for those wastes that are generated on a routine basis. The test results will be sent to you as they are received.

All wastes will be shipped off-site to the San Juan County Regional Landfill, Envirotech's Facility located in Hilltop, New Mexico, and other NMED or OCD permitted facilities.

As we discussed during your visit, Western Gas Resources will hydrostatically test existing underground lines prior to July 1, 2002.

Thank you for your review of our Discharge Plan and for taking time to visit the San Juan River Gas Plant. If you need any additional information to approve our plan, please let me know.

Ron LePlatt
Western Gas Resources, Inc.
(303) 252-6237
(303) 252-6240 (fax)

OCD ENVIRONMENTAL BUREAU

SITE INSPECTION SHEET

DATE: 12/20/01 Time: 9 AM

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 ☑ GW# 033

FACILITY NAME: SAN JUAN RIVER GAS PLANT
PHYSICAL LOCATION: 99 ROAD 6500 KIRTLAND
Legal: QTR___QTR___ Sec___ TS___ R___ County SAN JUAN

OWNER/OPERATOR (NAME) WESTERN GAS RESOURCES
Contact Person: RON LEPLATT, KENT McEVERS Tele:# 505-598-5601 x 23
MAILING ADDRESS: BOX 70 KIRTLAND NM State___ ZIP 87417
Owner/Operator Rep's:

OCD INSPECTORS: W PRICE, D FOUST, R BAYLESS

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.
pic #2- IMPROPER STORAGE & UN-KNOWN MATERIAL IN SOME DRUMS "B BASIN"
pic #9- SHOP PAD DRUM STORAGE- NEEDS CURB OR CONTAINMENT DEVICE

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.
pic #7- TEG DE-HYD KNOCK-OUT TNK NEEDS CONTAINMENT

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.

"A" BASIN STORE REFINED PRODUCTS - TANKS NEED TO BE MOVED BACK INTO BASIN, PIC #1

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.

5. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

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.

PIC #3 - CONTACT WATER #6 MAIN SUMP W SEC/LEAK DETECTION
PIC #5 - PLANT INLET PIGGING STATION NEED CONTAINMENT
PIC #8 - FILTER DRAIN SUMP - STANDING FLUIDS

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.

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.

PIC #4 - WASTE PILES * USED ACTIVATED ALUMINA + MO-SEIVE" NEED CLEAN-UP PLAN

LAB WATER NEEDS A TCLP & TEST (TOTAL) BEFORE DISPOSAL TO EVAP POND —

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

11. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the proper OCD District Office.

12. Does the facility have any other potential environmental concerns/issues?

13. Does the facility have any other environmental permits - i.e. SPCC, Stormwater Plan, etc.?

SPCC - YES

14. ANY WATER WELLS ON SITE? NO ☑ YES ☐ IF YES, HOW IS IT BEING USED ?

15. Documents reviewed:

EVAPORATION POND LEAK DETECTION RECORDS - OK ✓

Miscellaneous Comments:

PIC # 6 - EPNG REMEDIATION PUMP

Photos taken: 9

Documents Reviewed/Collected:

Pic#1- "A" Basin refined products storage area

Pic#2- B Basin drum storage area

Pic#3- Main plant sump "Contact water #6" has secondary containment with Leak detection.

Pic#4- Waste piles of used activated alumni, Mo-sieve and old cooling tower debris.

Pic#5- Main plant inlet pigging station west end.

Pic#6- EPNG's groundwater remediation well located north side of plant property.

Pic#7- TEG DE-hyd knock-out tank

Pic#8- Filter Drain sump


Pic#9- Shop pad drum storage area.

AFFIDAVIT OF PUBLICATION

Ad No. 45439

STATE OF NEW MEXICO
County of San Juan:

CONNIE PRUITT, being duly sworn says: That she is the Classified Manager of THE DAILY TIMES, a daily newspaper of general circulation published in English at Farmington, said county and state, and that the hereto attached Legal Notice was published in a regular and entire issue of the said DAILY TIMES, a daily newspaper duly qualified for the purpose within the meeting of Chapter 167 of the 1937 Session Laws of the State of New Mexico for publication on the following day(s): Thursday, December 20, 2001.

And the cost of the publication is $91.00.

Connie Pruitt

ON 12/21/01 CONNIE PRUITT appeared before me, whom I know personally to be the person who signed the above document.

Jacqueline L Alcorn

My Commission Expires October 22, 2005

NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan applications has been submitted to the Director of the Oil Conservation Division, 1220 S. Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW-093) - Burlington Resources, Greg Wurtz, Environmental Representative, P.O. Box 4289, Farmington, New Mexico 87499-4289, has submitted a discharge plan renewal application for their Rattlesnake Natural Gas Compressor Station located in the NW/4 of Section 36, Township 31 North, Range 9 West, NMPM, San Juan County, New Mexico. Natural gas products, waste oil and water is stored in above ground tanks prior to being transported off-site to OCD approved facilities. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 25 feet with an estimated total dissolved solids concentration of approximately 1200 mg/l. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

(GW-033) - Western Gas Resources, Inc., Mr. James Fleak, (303)-252-6237, 12200 N. Pecos Street, Denver, CO, 80234-3439, has submitted a Discharge Plan Renewal Application for their "San Juan River" Gas Plant located in Section 1, Township 29 North, Range 15 West, NMPM, San Juan County, New Mexico. Plant process wastewater is discharged to a double lined surface evaporation pond, designed with a primary liner leak detection system. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 10 feet with a total dissolved solids concentration of approximately 4,500 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 14th day of December 2001.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

LORI WROTENBERY, Director

Legal No. 45439, published in the Daily Times, Farmington, New Mexico, Thursday, December 20, 2001.

Approved
Wayne Price

DEC 26 AM 8:37

THE SANTA FE
NEW MEXICAN
Founded 1849

NM OIL CONSERVATION DIVISION
1220 ST. FRANCIS
SANTA FE, NM 87505
ATTN WAYNE PRICE

AD NUMBER: 240387 ACCOUNT: 56689
LEGAL NO: 70898 P.O.#: 2199000249
296 LINES 1 time(s) at $ 130.48
AFFIDAVITS: 5.25
TAX: 8.48
TOTAL: 144.21

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE
I, K. Voorhees 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 #70898 a copy of which is hereto attached was published in said newspaper 1 day(s) between 12/20/2001 and 12/20/2001 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 20 day of December, 2001 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/s/ K. Voorhees
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this
20 day of December A.D., 2001

Notary Laura E. Harding

Commission Expires 11/23/03

NOTICE OF PUBLICATION

STATE OF NEW MEXICO ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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(GW-276) - Hydrostatic Pipe Services, Inc., Darrell Deming, Jr., (505)393-7508, P.O. Box 2428, Hobbs, New Mexico 88240, has submitted a discharge application for its Oilfield Pressure-Testing Company located in the SE/4 SW/4 of Section 32, Township 18 South, Range 38 East, NMPM, Lea County, New Mexico. Wastewater is discharged to the City of Hobbs sewer system (POTW). Ground water most likely to be affected in the even of an accidental discharge is at a depth of approximately 34 feet with a total dissolved solids concentration of approximately 1,310 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.

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 14th day of December 2001.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

S E A L

LORI WROTENBERY, Director

Legal # 70898
Pub. December 20, 2001

Approved

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 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 14th day of December 2001.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

Roger Anderson

SEAL

for LORI WROTENBERY, Director

Western Gas Resources, Inc.

December 17, 2002

Mr. Wayne Price
New Mexico Energy, Minerals, and Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, New Mexico 87505

Re: Discharge Plan Renewal GW-033
San Juan River Gas Plant
San Juan County, New Mexico

Dear Mr. Price:

In accordance with Discharge Plan Approval Conditions 8 and 9, Western Gas Resources, Inc. (WGR) has performed inspections and testing of sumps and underground lines at the San Juan River Gas Plant. The results of those inspections and tests are hereby submitted.

Seven tests of underground pipeline systems were performed. Leaks were discovered from two of the systems. During the test of the pipelines leading to the contact water sump, leaks were discovered from three lateral pipelines of the main 6-inch drain line. The laterals are no longer used, and so were cut back to the main drain line and capped. The laterals were all above the main drain line, which is operated at atmospheric pressure. Therefore, it's highly unlikely that the unused laterals were leaking fluids to the subsurface.

Leaks were also discovered while testing the pipeline between the amine still and amine sump. The leaks were from unused drain lines that tie into the pipeline. Seven unused drain lines were capped. The unused drain lines are all above the tested pipeline. It is highly unlikely that the lines would have leaked during normal operating conditions.

WGR identified six sumps at the San Juan River Gas Plant. MGR determined that the treating plant sump, located on the north side of the treating building, was no longer required. Therefore, the sump was abandoned in place. The other sumps were pumped and cleaned out for visual inspections. All of the sumps were found to be in good condition, with no evidence of leaks or damage.

12200 N. Pecos Street • Denver, Colorado 80234-3439 • (303) 452-5603

Enclosed with this letter is a spreadsheet that provides a brief summary of the test and inspection results. Attachment A to this letter contains the procedures for testing of the underground pipeline systems, as well as the field notes for each test. Attachment B contains the field notes for the sump inspections and the abandonment of the treating plant sump.

I believe that this information fulfills our obligations under Discharge Plan Approval Conditions 8 and 9. If you have any questions concerning this information, please contact me at (303) 252-6237.

Sincerely,

Ronald R. LePlatt

Ronald R. LePlatt
Sr. Environmental Engineer

Cc: K. McEvers, D. Anderson, M. Brinkmeyer, B. Portz

Mr. Denny Faust
Oil Conservation Division – District 3
1000 Rio Brazos Road
Aztec, New Mexico 87410

Western Gas Resources, Inc.
San Juan River Gas Plant
Summary - Underground Line Tests and Sump Inspections

Identification of Line/Sump	Date of Test	Test Description	Duration of Test (Minutes)
Drain lines to evaporation pond	8/22/2002	5.4 psig air	35
Flare header line	8/22/2002	7.5 psig air	65
Still column to amine sump	9/25/2002	6 feet water	180
Reflux tank to flare scrubber	10/2/2002	10 psig air	10
Reflux tank to reflux pump suction	10/2/2002	38 psig air	10
Lines to contact water sump	10/15/2002	6 feet water	180
Valve box to inlet	11/21/2002	60 psig water	40
Boiler house sump	5/14/2002	Visual	
Treating plant sump	5/14/2002	Abandoned	
Amine sump	5/14/2002	Visual	
Filter/storm drain sump	5/14/2002	Visual	
Compressor sump	5/14/2002	Visual	
Contact water sump	5/15/2002	Visual	

Attachment A
Underground Pipeline Tests
Procedures and Field Notes

Procedures

Testing of Underground Lines in the Plant Area

Drain Lines for the Pond

1.0 Remove 2" union from line in A pump house.
2.0 Put a cap on the 2" line.
3.0 Close off the valve to the Contact water discharge line.
4.0 Close the valve at the inlet of the plant.
5.0 Open the valve at the plant valve system to the pond.
6.0 Go to the pond and put a blow up plug into line.
7.0 Blow up the plug.
8.0 Go to the 2" line fitting just in front of the Marley cooler and place a water fitting. Fill line with water. Place a 2" clear stand pipe and fill with water.
9.0 Mark water line and start a timed test. Watch the water level to see that the water level does not drop.
10.0 If water level is maintained for about 1 Hour line is O.K.
11.0 Go to the pond and remove the plug. Watch that water does not blow all over you.
12.0 Next go to the plant the plant valve system and put all valve back the way you found them.
13.0 Go to the plant inlet and open the valve.
14.0 Go to the Contact water discharge line and open the valve.
15.0 Go to A pump house and put the union back on the line.
16.0 The system is now in service.

2/15

August 22, 2002

Western Gas Resources

San Juan River Plant

The Underground line Test

Drain Lines for the Pond

Mr. Denny Foust of the New Mexico Oil and Gas Conservation Division (OCD) came out to witness the testing of San Juan River Plants drain lines.

We started our test with the drain line for the pond, which includes the Compressor drain from pump house to the valve station, the inlet scrubber to the valve station, the Contact Water discharge line to the valve station and the valve station to the lined pond. The line was put on test at 9:20 A.M. with 5.4 lbs P.S.I.. We returned to the test spot at 9:55 A.M. the gauge still showed 5.4 lbs. P.S.I..

Mr. Foust said this looked good to him. Mr. Foust ask Arlyn Thorson and Bob McClain is this line test repeatable? Both of us said yes. Mr. Foust said a number of times he liked using a 2" water column unit for testing the lines.

3/15

Procedures

Testing under ground lines in Plant

Flare Scrubber to Inlet Yellow Tank

1.0 Install a pressure gauge on the top of the 8" line at the inlet to the Flare Scrubber.
1.0 Close valve on bottom of Flare Scrubber.
2.0 Close 8" valve at Flare Scrubber.
3.0 Close all valves on Aneth Inlet.
4.0 Go to the East end of the Yellow Tank and Close the valves.
5.0 Go to the Aneth makeup gas to the Yellow Tank. Open the valve to pressure up the inlet.
6.0 Start adding gas to line. Fill line to 5 lbs or more. Close gas valve.
7.0 Go to the Flare Scrubber and watch the pressure gauge for leak off. If line holds pressure line is O.K..

4/15

August 22, 2002

Western Gas Resources

San Juan River Plant

The Underground Line Test

Flare Header Line

Mr. Denny Foust of the New Mexico Oil and Gas Conservation Division (OCD) came out to witness the testing of San Juan River Plant drain lines.

We started the Flare Header line. This line is from the yellow tank at the inlet, the sludge catcher and the line to the 100,000 gallon tank to the Flare scrubber at the Sulfur Plant. We started this test at 10:20 A.M. at 7.1 lbs. We returned to the Flare line at 10:45 A.M. this line had gained .4 P.S.I. to 7.5 lbs. Mr. Foust said to start the test over and if this was 7.5lbs. would remain for 30 minutes that would be a valid test. Arlyn Thorson and Bob McClain watched this test until 11.50 A.M., The pressure stayed at 7.5 lbs.

Bob McClain called Mr. Foust Monday August 26, 2002 to give an up date report of our water test. I did not talk to Mr. Foust but left a message. I reported the Flare Header was in good shape and the pressure maintained 7.5lbs. I reported that the Filter / Storm drain line test did not pass, that we had a leak. I told Mr. Foust that I would call back when I got the line fixed and re tested O.K..

5/15

Procedures

Plant under ground line

Drain line from Still Column to the Amine Sump
Test with Water

1.0 Have operator pump Amine sump down until liquids are below inlet drain.

2.0 Write up a Safe work permit checking the under ground sump for toxic gases, H2S, Flammable gases, LEL, and Oxygen levels. If everything is O.K. Place a latter into sump. Keep monitoring the sump for H2S, LEL, and O2 levels. Go into the sump and place a rubber plug into the drain line. Blow up the rubber plug until a good seal is made.

3.0 Go to the drain at the Still column an remove the blow down lines an place the test plug with indicator into drain. Make sure the plug makes a good seal.

4.0 Go to the fan units on hill. On the North side drain line, the old cut off drain line put a 2"clear stand pipe. Fill the drain line with water. Fill the clear 2" stand pipe with enough water that a water level is made. Mark the water level or measure the water level for a starting point.

5.0 Start a timed test. If the water leaks off, recheck the sump drain rubber plug in the sump, the plug at the Still drain and the 2" clear stand pipe for leaks. This line must hold a water level for at least 1hour.

6.0 Refill the line with water again. Check for a good water level again. Mark the level for a starting point. Start another timed test.

7.0 Watch the water level to see that the water level is maintained. If a good water level is maintained, then the lines is tested to be in good shape. If the water level has dropped off. If the lines have a leak line is not good.

8.0 Recheck the Amine sump for H2S, LEL, and 02. If everything is O.K. inter the Amine sump.

9.0 Remove the rubber plug. When removing the plug watch that the pressure does not blow Amine and water all over you.

10.0 Go to Still and remove test plug and indicator.

11.0 Place the blow down lines into the drain.

12.0 Go to the hill and remove the 2" clear stand pipe from the line. Put a 1" plug into line.

13.0 The drain line is now back in service.

6/15

September 19, 2002

Western Gas Resources

San Juan River Plant

Underground Line Test

Amine Still to the Amine Sump

Bob McClain set up for the underground line test for the line from the Amine Still to the amine sump. The Amine Sump was pumped down and a rubber blow up plug was installed into drain line. The plug was blown up and another plug was put into the still drain. A 2" clear test pipe was put at the highest point of the line for our test. The highest point of the line was up by the cooling fans. Water was added to line, until a water level was made. The water level was marked. The line set for 2 Hours. The water level had dropped off. We found a leak. The leak was capped off and welded. We have plugged and welded 7 old drains that were tied into this system. All of these 7 lines that were leaking are old drain lines that are no longer in service. All 7 of these lines were capped off and welded. These lines were all above the drain line to the sump. These lines never would have leaked under normal operating conditions. These lines leaked only when a water level was put at the highest point for our test. The water level was retested again September 23, 2002. The water level stayed at set point for 2 Hours. I retested the line again September 25, 2002. I found the rubber plug was leaking a little. I put more pressure on the plug and filled test pipe to set point with water and started another test. The line held for 3 Hours with no loss of water. I feel this line is a good test with positive results. No leaks. I feel this test can be repeated with the same results no leaks.

7/15

Procedures

Testing under ground lines in Plant

Reflux Tank to Flare Scrubber

1.0	Close 2" line to Flare Scrubber.(Fl- oo1)
2.0	Close valve coming off Reflux Tank AV 600.
3.0	Close 1" valve coming off TK 8 Tank. Condensate / Water Tank
4.0	Open 2" line to Flare Scrubber.
5.0	Install a test unit to the 1" line
6.0	Open the 1" valve with test fitting.
7.0	Start adding air to line. Fill line to 5 # or more.
8.0	Check for pressure leak off. If no leak, line is O.K..
9.0	Open test line to remove any pressure on line through test fitting.
10.0	Close 1" drain line and remove test fitting.
11.0	Close 2" line to flare Scrubber.
12.0	Open 1" valve off TK-8 Tank. Condensate / Water Tank.
13.0	Open 2" line to Flare Scrubber (F1-001).
14.0	Putting reflux to flare scrubber back into service.

8/15

October 2, 2002

Western Gas Resources

San Juan River Plant

Underground Line Test

Reflux Tank to the Flare Scrubber

Bob McClain, and Operator Jimmy Jones set up the test for the underground line at the Sulfur Plant. We tested the Reflux Tank to the Flare Scrubber. We closed the inlet valve on the flare scrubber. We closed the valves on the Reflux Tank We closed the valve off the Condensate / Water Tank. We hooked up to the 1"valve with a pressure gauge and air fitting. I added air to the line until we read 10 lbs. We watched the gauge for about 10 to 12 minutes. The gauge read 10lbs pressure with a very slight change. We called the line good. Water is transferred through this line as needed to drain the Condensate / Water Tank TK-8 to the Flare Scrubber.

9/15

Procedures

Testing under ground lines in the Plant

Reflux Line to Reflux Pump Suction

1.0 Close valve on reflux tank by sight glass, inside metal building
2.0 Go to the reflux pumps. Turn off the pumps.
3.0 Close both the inlet valves on the suction side of the pumps.
4.0 Make sure the bypass valve is Closed.
5.0 Close both the discharge valves off pumps.
6.0 Install a test fitting and gauge on the drain line of the pump.
7.0 Open valve and start adding air to line. Fill line to 10lbs or more.
8.0 Check for any air leak or pressure loss. If no leak or pressure loss, line should be O.K..

10/15

October 2, 2002

Western Gas Resources

San Juan River Plant

Underground Line Test

Reflux Tank Line to Reflux Pump Suction

Jimmy Jones, Frank Hale and Bob McClain set up to test the line. I checked the pressure on the pump not running. It read 7 lbs. We closed the valve at the reflux water tank going to the suction of the reflux pumps. The pump running was shut off. I closed both of the bypass valves, the discharge valves off both pumps, and the suction valve to the East pump. The line pressure read 19lbs. I opened the blow down line and started adding air. I added pressure to 38lbs and closed the valve. We watched the air pressure on the gauge and had no loss of pressure. We put the system back into service. We opened the valves we closed and put the pump back on. I read the pressure off the discharge gauge of the pump running and it read 82 lbs. This system maintains 80lbs. to 83 lbs. discharge pressure all the time.

11/15

Procedures

Plant under ground lines

1. Filter / Storm water drain, Lab drain water, Air tank water drain, Boiler house sump drain and Boiler house large sump drain.

   Procedure for testing under ground lines to underground Contact water tanks.

   1.0 Place two rubber plugs into Filer / storm water sump drain line. Blow up the rubber plugs until a good seal is made. Two plugs are used because the pipe is uneven and rough.
   2.0 Make sure the valve on the inlet to the lab drain line is open.
   3.0 Place a rubber plug into the Boiler house large sump line. North side of Boiler house.
   4.0 Remove the 1" union off the Boiler house sump line. Place a 2" clear stand pipe into the line. This line is at the South East corner of the building.
   5.0 Disconnect the 1" line off the Air Tank and put a 1" cap on line.
   6.0 Write a Safe work permit and check the under ground sump for H2S, LEL, and O2. If everything is O.K. Place a latter into the sump. Keep monitoring for H2S, LEL, and 02. Go into the sump.
   7.0 Install a rubber plug into the North inlet line of the under ground contact water sump. Blow up rubber plug and make sure a good seal is made.
   8.0 Go to the lab and start running water into drain. Fill the line with water until a level is made or made in the 2" clear stand pipe at the Boiler house. Fill the sink at the lab with water until a level can be marked to measure. Mark or measure the level in the lab sink.
   9.0 Go to the Boiler house and measure or mark the water level on the 2" clear stand pipe.
   10.0 Start a timed test. Watch the water level to see if it drops off any. If the water level drops, recheck your plugs for leaks. Fix plugs if need be. Fill lines again to establish a water level. Start another timed test. If the water falls off, keep filling lines with water until water comes out of the ground. Dig up leak and fix the line. If no leaking occurs and a level is maintained lines are good.
   11.0 Check the contact sump again for H2S, LEL and 02.
   12.0 Go into sump and remove the plug from drain line. This will put line back into service
   13.0 Go remove the rubber plug from the sump line at the North side of the Boiler House. This will put the sump back into service.

14.0 Remove the 2" clear stand pipe. Put the 1"union back on the sump discharge line. This will put the Boiler House sump back into service.

15.0 Remove the 1" cap off the Air Tank line. Put the 1" union back on the line from the tank to the drain line. This will put the Air Tank and the drain line back into service.

16.0 Remove both the rubber plugs at the Filter / Storm water drain. This will put the sump back into service.

17.0 The Filter / Storm drain lines are all back into service now.

13/15

August 22, 2002

Western Gas Resources

San Juan River Plant

The Underground Line Test

Mr. Denny Foust of the New Mexico Oil and Gas Conservation Division (OCD) came out to witness the testing of San Juan River Plant drain lines.

We started the Filter / Storm drain line test. The Filter/ Storm Drain to contact water sump, which consist of the Boiler House pump line, the Air Tank drain, the Lab sink, the North Boiler House Sump drain and the process storm water run off drain at 10:05 A.M.. We rechecked the line pressure at 10:35 A.M. The line pressure had dropped off by 1 lb. We found the stopple plug leaking off. I drained The Filter / Storm drain system and fixed the stopple from leaking. I filled the system with water again and started another line test. The line did not hold water pressure or air pressure. We have a leak in our line. We retested the line August 26, and August 27, 2002. August 28, 2002 we found water coming out of the ground. We dug up the line, we found a leak in the 6" line. We cut the old line off back to where the line tied in to the main 6" drain line. We installed a plug by welding a plug into place. I filled line with water again and started another test on September 9, 2002. Our test failed again, another leak. We dug up the line again finding a 1 ½" line with a 1/2" capped off riser was leaking. The leak was just North of the operators building. We dug this line back to 6" main drain. We found a 8" pipe just South of this 1 ½" line. The 8" line was covering a ½" line with a valve, it also was leaking. Both the 1 ½" and the ½" lines were tied in to the main drain line. We cut off both lines and plugged off. The only way we found these leaks was by putting 8lbs. to 10 lbs. water pressure to the main drain line. These lines were above the water level. The water pressure found where the lines were leaking. I filled the lines again with water and started another test. I found a rubber stopple plug leaking again. Will try this test again.

October 15, 2002

Western Gas Resources

San Juan River Plant

The Underground Line Test

Filter / Storm Drain Lines

I stared the Filter / Storm drain line test. The Filter / Storm Drain line consists of the Filter / Storm Sump, Boiler House Sump line, Air Tank drain line, the Lab sink line, the North Boiler House Sump and the process storm water run off drain line. I had placed the rubber blow up plugs into the lines. I placed two blow up plugs into the Filter / Storm Drain Sump. We had leaking because of the rough and uneven pipe surface when using one plug. We had tested this line and found our leaks were due to the rubber plugs not holding the water head pressure. I filled the line system with water. I put a 2" clear standpipe on the line at the Boiler House Sump line, and filled with water. I marked the standpipe and started our time test. The test started at 9:05 A.M. I checked our standpipe every few minutes to see if the water level had fallen. The water level did not drop any. I ran our test for 3 Hours with no loss of water level or signs of a water leak. I ended the test at 12: 05 P.M. I had run this water test on these lines October 14, 2002 with the same results. No leaks or loss of water. I feel this water test is a good and positive test for our line. I feel this test can be repeated with same results. No leaks. I have tested this line many times over the past few months and have found 4 leaks. We dug up the leaks and repaired them. We either cut off old lines and welded plugs into place or used a pipe clamp.

15/15

November 21, 2002

Western Gas Resources

San Juan River Plant

The Underground line Test

New Drain Line from Valve Box to Inlet

Mr. Kent McEvers, Charlie Medders and Bob McClain set up to test the underground line. We hooked up a fire hose to the line and slowly filled the line with water. Water pressure was added to line. The valves at the inlet and at the valve box were closed. This line held 60 lbs of water pressure. We tested this line 3or 4 times putting pressure on the line and leaving for 30 or 40 minutes each time. The line showed no leaks.

The old line was cut and relocated do to the construction for the Praxair project. A new 4" line was relocated and put in place of the old line. About 140'of new line was installed. This line tested good and showed no leaks. All agreed that this test is repeatable.

Attachment B
Sump Inspections
Field Notes

SAN JUAN RIVER PLANT

SUMPS

1. Boiler House	Location: South East corner of building in the basement.
2. Treating Plant	Location: Inside building, north side of building in floor.
3. Amine Sump	Location: South of treating plant by south west doors.
4. Filter Drain Sump	Location : West of control room.
5. Compressor Sump.	Location: Dog house north end of compressor building outside.
6. Contact Water Sump.	Location: By #6 down hole.

Sump Inspection

Boiler House May, 14, 2002

Location: South East corner of building in the basement of Boiler House.

Concrete Sump:

The sump was pumped out. Sump was cleaned out. Inspection of sump was made. Concrete sump was in good shape. No signs of cracks or breaks in the concrete. Everything looked to be in very good shape. Inspection was hands on and visual.

Robert McClain

3/8

Sump Inspection

Treating Plant May 14, 2002

Location: Treating Plant North side of Building
(Out of Service) Sump on longer needed.

The Sump was filled with dirt. The dirt was compacted on Wednesday June 12, 2002. The I.M.I. crew poured concrete into sump. I filled all the drain lines with concrete.

Robert McClain

4/8

Sump Inspection

Treating Plant May 14, 2002

Location: Amine Sump

The Amine sump is made of steel. The sump was pumped out. The sump was cleaned out. I went in to the sump cleaned out weeds and trash. I washed down the walls and floor of the sump. The sump was pumped out. Inspection of walls and floor was made. Everything looked very good. Inspection of the welds was made. Welds looked to be in good shape. There was no sign of cracks or breaks in the metal. The inspection was hands on and visual. A flammable gas test, oxygen test and a toxic gas test was performed before the inspection was made.

Flammable Gas Test performed
LEL. % Time 10:50 A.M. Reading .3
Follow up Reading .2

02 Oxygen Test performed
02 Time 10:50 A.M. Reading 21.2%

Toxic Gas Test performed
PPM Reading Time 10:50 A.M. Reading 0 PPM
Follow up Reading 0 PPM

Robert McClain

5/8

Sump Inspection

Filter / Storm Drain Sump May 14, 2002

Location: Sump by Operators Station West of Control room.

Sump was pumped out and all silt cleaned out. Sump is made of concrete. A two section sump. The inspection was made. All walls of sump looked to be in .good shape. The middle section was showing some ware on the concrete. The Sump looked to be solid and sound. There were no signs of leaking. The Sump has a 6" drain line.

Robert McClain

6/8

Sump Inspection

Compressor Sump May 14, 2002

Location: North End of Compressor Building

Sump is made of concrete. Sump inside of small dog house at the North end of the compressor building. Sump was pumped out and cleaned. There was no sign of breaks or cracks in the concrete. The sump looked to be in good and solid. The sump was in good shape. The inspection was hands on and visual.

Robert McClain

7/8

Sump Inspection

Contact Water Sump

May 14, 2002
May 15, 2002

Location: By # 6 Down Hole North of Lab Building

A air blower was used to remove gases and air. The sump is made of steel. The sump is made of 3 steel tanks into one tank. The sump has a liner. There is a down hole inspection tube. Sampled are taken monthly and findings are recorded. All records are recorded in the S.P.C.C. book for the plant. The sumping of the sump were not completed on May 14, 2002. Work was continued on May 15, 2002. The sump was cleaned out. The cleaning , washing and removable of solids was completed. A flammable gas test, 02 oxygen test and a Toxic Gas test was done each day before work was started.

May 14, 2002

Flammable Gas Test was performed
LEL Time 11:35 A.M. Reading .2

02 Oxygen Test was performed
02 Time 11:35 A.M. Reading 21.9 %

Toxic Gas Test performed
LEL Time 11:36 A.M. Reading .2 PPM

May 15, 2002

Flammable Gas Test was performed
LEL Time 1:45 P.M. Reading 0 % Close to top of tank
LEL Time 1:55 P.M. Reading 0 % 8` to 9` in to tank

02 Oxygen Test performed
02 Time 1:45 P.M. Reading 21.2 % Close to top of tank
02 Time 1:55 P.M. Reading 21,2 % 8` to 9` into tank

Toxic Gas Test performed
LEL Time 1:45 P.M. Reading 0 PPM Close to top of tank
LEL Time 1:55 P.M. Reading 0 PPM 8` to 9` into tank

I went into the tank. Inspection was done. Sump looked to be in good shape. All welds looked to be in good shape.

The bottom looked clean and shiny. Everything looked to be in good shape. The inspection was hands on and visual.

Robert McClain

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 12/12/01

or cash received on _____ in the amount of $ 100.00

from WESTERN GAS RESOURCES INC.

for SAN JUAN GP GW-33

Submitted by: (Facility Name) WAYNE PRICE Data: (DP No.) 12/13/01

Submitted to ASD by: _____ Data: "

Received in ASD by: _____ Data: _____

Filing Fee ✓ New Facility ___ Renewal ___

Modification ___ Other _____ (specify)

Organization Code 521.07 Applicable FY 2002

To be deposited in the Water Quality Management Fund.

Full Payment ___ or Annual Increament ___

THE BACK OF THIS DOCUMENT CONTAINS AN ARTIFICIAL WATERMARK

Western Gas Resources, Inc.

12200 North Pecos Street
Denver, CO 80234
Telephone: (303)452-5603

Bank of America
Atlanta, Dekalb County, Georgia
64-1278/611

Check No. [redacted]

Check Date
12/12/2001

Check Amount
$ *******100.00

VOID IF NOT CASHED WITHIN NINETY DAYS

PAY *One Hundred AND 00/100*

TO THE ORDER OF

NEW MEXICO ENVIRONMENTAL DEPARTMENT
WATER QUALITY MANAGEMENT FUND
2040 S PACHECO
SANTA FE, NM 87505
UNITED STATES

7762

Peter A. Dea

[redacted]

Western Gas Resources, Inc.

December 12, 2001

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

Re: Renewal of Discharge Plan GW-33

To Whom It May Concern:

Enclosed with this letter are two copies of the Discharge Plan Renewal Application for Western Gas Resources, Inc.'s San Juan River Gas Plant, located in San Juan County. A copy of the application has been submitted to the District III office of the Oil Conservation Division in Aztec.

A check in the amount of $100.00 is enclosed with this application. The check is for the filing fee prescribed by 20.6.2.3114 NMAC.

Thank you for your cooperation in this matter. If you have any questions concerning the application, please contact me at (303) 252-6237.

Sincerely,

Ronald R. LePlatt
Sr. Environmental Engineer

Cc: OCD District III Office, Aztec, New Mexico

K. McEvers, D. Anderson, M. Brinkmeyer, B. Portz

12200 N. Pecos Street • Denver, Colorado 80234-3439 • (303) 452-5603

DISCHARGE PLAN

WESTERN GAS RESOURCES, INC.
SAN JUAN RIVER PLANT
SAN JUAN COUNTY, NEW MEXICO

Submitted to:

New Mexico Energy, Mineral & Natural Resources Department

of Oil Conservation Division

Submitted for:

Western Gas Resources, Inc.

12220 North Pecos Street

Denver, Colorado 80234

December 5, 2001

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 January 24, 2001

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

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

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

☐ New ☒ Renewal ☐ Modification

1. Type: Gas Plant

2. Operator: Western Gas Resources, Inc.

   Address: 12000 North Pecos Street, Denver, Colorado 80234

   Contact Person: Ron LePlatt Phone: (303) 252-6237

3. Location: _____/4 _____/4 Section 1 Township 29N Range 15W
   Submit large scale topographic map showing exact location.

4. Attach the name, telephone number and address of the landowner of the facility site.

5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.

6. Attach a description of all materials stored or used at the facility.

7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.

8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.

9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.

10. Attach a routine inspection and maintenance plan to ensure permit compliance.

11. Attach a contingency plan for reporting and clean-up of spills or releases.

12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.

13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.

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

Name: Edward A. Aabak Title: Sr. Vice-President - Operations

Signature: Edward Aabak Date: 12/10/01

TABLE OF CONTENTS

LIST OF FIGURES

LIST OF APPENDICES

1 GENERAL INFORMATION

1.1 Western Gas Resources Representatives

Name of Discharger/Legally Responsible Party:

Edward A. Aabak
Sr. Vice-President, Operations
Western Gas Resources, Inc.
12200 North Pecos Street
Denver, CO 80234
(303) 452-5603

Local Representative:

Kent McEvers
Area Manager
Western Gas Resources, Inc.
P.O. Box 70 Kirtland, NM 87417
(505) 598-5601

Please direct questions and a copy of all correspondence to:

Ronald R. LePlatt
Sr. Environmental Engineer
Western Gas Resources, Inc.
12200 North Pecos Street
Denver, CO 80234
(303) 252-6237

1.2 Location of Discharges

The San Juan River Plant is located in Section 1, Township 29 North, Range 15 West, San Juan County, New Mexico, approximately eight miles west of Farmington and 1.7 miles north of Kirtland, New Mexico. Highway 550 and County Road 61 provide access to the plant.

The land to the north and west of the plant site is publicly owned. Approximately thirty private owners have tracts to the south and east of the plant.

1.3 San Juan River Plant Operations

Current activities at the San Juan River Plant include natural gas sweetening and processing, gas compression, gas dehydration, sulfur recovery, liquid storage, and operation of plant utilities. These utilities include steam producing boilers and a cooling water system. The cooling water system is only operated during the warm weather months as a trim cooler; therefore, the wastewater generated by the cooling system blow-down is produced only during those months of warm weather operation.

2 PLANT PROCESSES

2.1 Sources and Quantities of Effluent and Process Fluids

The source of the San Juan River Plant's water is the Public Service of New Mexico (PSNM) power plant located northwest of the WGR facility. Approximately 15,000 gallons of high-quality water are purchased daily from the PSNM power plant.

Contact waste water (process water that has contacted the hydrocarbon stream) is generated at a rate of approximately 1480 gallons per day by the following sources:

- Triethylene glycol (TEG) and molecular sieve dehydration units - The TEG dehydration unit and periodic regeneration of the molecular sieve beds create a wastewater stream. This stream is considered to be an exempt waste in accordance with RCRA Subtitle C regulations listed in 40CFR261.4(b)(5). The various exempt waste streams are listed in the May 1995 EPA document number EPA530-K-95-V003.

- Amine reflux – Amine reflux is collected in the amine sump. The reflux normally is pumped back into the amine sweetening system and reused. During plant upsets, this stream may be directed to the lined impoundment. This stream is an exempt stream in accordance with 40 CFR261.4(b)(5). It is specifically identified as gas plant sweetening wastes for sulfur removal in the EPA document number EPA530-K-95-V003.

- Gas inlet – Contact wastewater is produced at the inlet slug catchers and separator tanks. The stream is an exempt waste in accordance with 40CFR261.4(b)(5) and is listed in the May 1995 EPA document number EPA 530-K-95-V003.

- Laboratory test waste - Contact wastewater is produced by laboratory tests performed at the plant. The tests are performed to determine the content of H_2S in the inlet gas stream. The laboratory waste stream produces low volumes and is considered to be a non-exempt waste in accordance with 40CFR261.4(b)(5). The non-exempt waste streams are listed in the May 1995 EPA document number EPA 530-K-95-VO03.

  The typical laboratory waste was collected in a sterile 5-gallon pail and a grab sample was retrieved for analyses of hazardous waste characteristics (ignitability, corrosivity, reactivity, and toxicity). The sample results indicated that this waste is not characteristically hazardous. A copy of the 1996 Laboratory analytical results is included in Appendix A. This waste is also not a listed waste per the RCRA regulations. This waste stream is commingled with the contact wastewater stream. The commingled wastewater stream is an exempt type waste according to RCRA Subtitle C, since the non-exempt waste does not indicate hazardous characteristics prior to commingling and since the other contact wastewater streams are exempt. The mixture rule is also discussed in the EPA document number EPA530-K-95-VO03.

Non-contact wastewater is currently produced at an average rate of 165 gallons per day by combining the blow-down streams from the following plant functions:

- Boiler blow-down - Two boilers produce steam for the amine unit and other process requirements. Periodic blow-down is required to reduce total dissolved solids (TDS). This stream is routed through a sump and subsequently to the cooling tower. This stream is considered non-hazardous based on process knowledge and is not a RCRA listed waste. Periodic in-plant tests performed for pH and conductivity also demonstrate that this waste stream does not exhibit the characteristic of corrosivity.

- Cooling tower blow-down - An evaporative cooling tower is being used to cool water for the boiler and gas process units. Much of the water is recycled, but some blow-down is required to avoid exceeding operating limits for TDS, phosphates, and hardness. Variation in the blow-down rate will occur during the year due to the seasonal operation of the cooling tower system. Cooling tower blow-down in gas production is considered as an exempt waste in accordance with 40CFR261.4(b)(5) and is listed as an exempt waste in the EPA document number EPA530-K-95-V003.

- Sulfur recovery plant – Condensed stream from the sulfur recovery treatment plant is periodically generated in low volumes. This stream is an exempt waste in accordance with 40CFR261.4(b)(5). It is specifically identified as gas plant sweetening wastes for sulfur removal in the EPA document number EPA530-K-95-V003.

- Waste hydro-test water is periodically generated during plant maintenance and construction operations. Hydro-test wastewater is an exempt waste in accordance with 40CFR261.4(b)(5). Disposal of this water is made to the lined evaporation impoundment.

Site plot plans are presented as Figure 1A in Appendix B. A process flowsheet sketch is presented in Figure 2A. A summary of the expected annual wastewater discharge volumes is presented below:

Annual Wastewater Discharge Estimation	
Contact water to lined impoundment	540,000 gallons
Non-contact water to lined impoundment	60,000 gallons
Total expected wastewater discharge	600,000 gallons

2.2 Quality Characteristics

The non-contact wastewater stream is commingled with the contact wastewater stream in a large sump and then routed to the lined impoundment. Wastewater characteristics will vary depending upon the ratio of contact to non-contact water being discharged to the impoundment at any given time. More non-contact wastewater is produced during the warm weather months than during cooler months, due to the operation of the cooling tower system.

The following analytical results were obtained from grab samples taken at the lined pond on May 14, 2001. The analysis results are presented below and the laboratory report is included in Appendix A.

Surface Impoundment Wastewater Results

Constituent	Unit	Result
Arsenic	mg/L	<0.1
Barium	mg/L	<0.5
Cadmium	mg/L	<0.01
Chromium	mg/L	<0.02
Lead	mg/L	<0.1
Mercury	mg/L	<0.01
Selenium	mg/L	<0.1
Silver	mg/L	<0.05
Benzene	ug/L	<1.0
Toluene	ug/L	<1.0
Ethylbenzene	ug/L	<1.0
Xylenes (total)	ug/L	<3.0
pH	s.u.	7.3

2.3 Transfer of Process Effluent

The mechanism for the transfer of contact and non-contact wastewater to the lined impoundment is the contact sump at the north end of the plant yard (see figure 1A). The metal sump is approximately 10 feet deep, with an area of 2 feet by 2 feet.

There are three monitoring points at the plant. Monitoring points #1 and #2 are used for leak detection at the leachate collection area of the impoundment. Monitoring point #6 is used for leak detection at the contact wastewater sump.

Used compressor engine oil and other fluid wastes associated with plant operations are not combined with process effluent. These fluids are collected in drums or tanks to prevent their migration into the environment. No waste fluids are stored in pressurized tanks.

Non-Contact Water

All boiler and cooling tower blow-down is discharged to the contact sump and subsequently to the lined impoundment. The disposal method is discussed in greater detail in Section 3. 1. The cooling tower blow-down is an exempt waste in accordance with 40CFR261.4(b)(5) and is specifically identified in the EPA document number EPA530-K-95-V003. The boiler blow-down is a non-hazardous waste stream.

Contact Water

All contact wastewater generated at the plant is directed through buried piping to the inlet separator tanks. The wastewater from the inlet separator tanks is then piped to the contact wastewater sump and subsequently to the lined impoundment. The contact wastewater is exempt from RCRA Subtitle C in accordance with 40CFR261.4(b)(5), except for the small volumes of laboratory waste.

The lab waste stream is generated by the daily H_2S Tutweiler tests performed at the plant. The waste consists of small amounts of water, 1/4% iodine, H_2S extracted from the gas sample, sulfuric acid, and/or hydrochloric acid. No more than one quart per month each of the iodine or acids are used. These wastes are considered non-exempt according to RCRA Subtitle C regulations. The laboratory waste was sampled on November 19, 1996 and the results of the analyses indicated that the waste is not considered characteristically hazardous due to ignitability, corrosivity, reactivity, or toxicity. The lab waste does not contain any of the listed RCRA wastes.

2.4 Spill/Leak Prevention and Housekeeping Procedures

The areas where significant spills would be most likely to occur are the areas near the wastewater sump and the lined impoundment. A copy of WGR's on-site Spill Prevention Control and Countermeasure Plan (SPCC) is included in Appendix C. The spill/leak prevention and housekeeping procedures are discussed in the following sections.

2.4.1 Monitoring of Wastewater Disposal Systems

The wastewater handling and disposal system includes adequate provisions for detection of equipment and liner leaks. The contact sump is configured with monitoring wells and secondary containment. The secondary containment for the sump consists of a plastic liner surrounding the sump.

The lined impoundment is configured with a leak detection/leachate collection system. Refer to Figures 2B, 2C, and Section 3.1 for construction details. The pond berms and exposed portions of the liner are inspected monthly. To verify the integrity of the pond liner, the leak detection system monitoring wells are also inspected monthly. Monitoring records are maintained at the plant office. In the event that fluids are present in a monitoring well, the San Juan River Plant supervisor will first pull a sample to visually determine if the sample could indicate a leak of pollutants. If the sample indicates a leak of pollutants from the pond, then the supervisor will notify the Corporate Environmental Staff located in Denver and notify the OCD in Santa Fe or

Aztec as soon as possible, but no later than the next business day. A suspect fluid sample will be analyzed to determine the source of the fluids. Analytical results will be provided to the NMOCD as soon as they become available, and corrective action based on the results will be taken if necessary.

2.4.2 Protection from Spills and Leaks

Western Gas Resources intends to act responsibly to avoid spills or leaks that might harm the environment. Plant personnel are aware of the imperative nature of spill prevention. Housekeeping measures require prompt identification of leaks, drips and spills.

WGR utilizes two concrete storage basins (basin "A" and "B"). The basins were formerly used as containment for cooling towers and storage tanks that have been dismantled and removed.

The following substances are stored in basin "A" in quantities of 500 gallons or less: bio-degradable type solvent, gasoline and diesel fuel. Methanol is also stored in basin "A" at a quantity of 1000 gallons or less. The basin walls are high enough to adequately contain the contents of a ruptured tank. WGR stores cooling tower and boiler chemicals inside plant buildings on concrete floors. Accidental spills of these chemicals onto the building floors will be promptly cleaned up.

WGR uses the concrete basin "B" as a drum storage area. Empty drums are also stored in this area. The drums stored at this location contain sulfuric acid. Drums are not likely to be disturbed since they will be located away from normal work areas.

In April 1999 WGR implemented the use of four above ground storage tanks. The tanks included three existing 40,000 gallon "bullet" type tanks and one new 17,000 gallon horizontal tank.

The three 40,000 gallon bullet tanks are used in WGR's 24 mmscf/day natural gas liquids unit in order to process gas gathered by the Aneth gas pipeline. Although the processed gas liquids are usually pumped through a gas liquids pipeline directly offsite, occasionally the processed gas liquids (y-grade) are collected and stored in the 40,000 gallon bullet tanks. Since the y-grade product is considered to be a gas at standard ambient conditions, a liner and berm is not required for the pre-existing 40,000 gallon tanks.

The 17,000 gallon tank is used to receive and store pigging liquids brought to the plant inlet via periodic pipeline pigging activities. Typical hydrocarbons contained in the pigging liquids could include butanes or heavier constituents. This tank is rated for 148 psig, but typically operates in the range of 15 psig. A 30-mil liner was placed under the tank and a three foot lined (30-mil) berm surrounds the tank.

Below-grade effluent disposal systems will be monitored as discussed in Section 2.4. 1. Above-ground tanks and drums will be visually inspected monthly by plant personnel for evidence of leaks or spillage. Plant personnel will ensure that run-off from maintenance activities is not contaminated. Basins "A" and "B" as well as the Amine sump are scheduled for physical inspection at least once annually for evidence of leaks.

2.4.3 Spill Response Measures

WGR procedures require prompt attention to spills. Although no large volumes of hazardous substances are stored at the San Juan Plant, small spills may occasionally occur. The following substances are present at the plant site and could potentially be released to the environment:

- plant materials, such as engine oil, diesel fuel, gasoline, and methanol,
- treatment chemicals, including sulfuric acid, boiler and cooling tower chemicals, amine, spent caustic, and triethylene glycol,
- process effluent, including contact and non-contact wastewater, and
- production materials, including pigging sludge.

WGR will respond to a spill in the following manner:

(1) The San Juan River Plant Area Manager will designate employees to respond to a spill. Plant employees will report the spill to the manager and will take appropriate cleanup action.

(2) If a spill involves more than five barrels of refined materials, ten barrels of production materials, or threatens the waters of the state, the San Juan River Plant Area Manager will notify WGR environmental staff at the corporate office. The Corporate office personel will contact the appropriate regulatory agencies and the spill will be mitigated as soon as possible.

(3) Spills not addressed in (2) above will be handled in accordance with this discharge plan.

Absorbent pads and booms are available at the plant site, although the site location makes a discharge to surface water highly unlikely. In the event of a discharge to land, shovels and sand are available for cleanup. Contaminated materials will be handled according to applicable environmental regulations. See Section 3.3 for discussion of solid waste disposal.

2.4.4 Inspection of Underground Wastewater Piping

Since acquisition of the plant in 1989, WGR has plugged and abandoned most of the underground pipe at the San Juan River Plant. WGR is currently developing a plan to inspect the remaining underground wastewater piping.

3 EFFLUENT DISPOSAL

The San Juan River Plant is self-contained. No effluent discharge to surface or ground water, or unlined ponds, is permitted. Plant practices are not expected to threaten ground water quality and should not result in ground water contaminant concentrations in excess of New Mexico Water Quality Control Commission (WQCC) standards.

3.1 On-site Facilities

The wastewater management plan for the San Juan River Plant includes discharging the majority of the process effluent to a lined evaporation impoundment constructed with a leak detection/leachate collection system.

The lined impoundment, located at the south end of the plant property, is lined with high density polyethylene (HDPE), and has the following specifications:

Liner:	45-mil HDPE on sides, 30-mil HDPE on pond bottom
Dimensions:	250 feet x 150 feet x 4 feet, 4 inches
Volume:	773,000 gallons with 1-foot freeboard
Slope:	1.3 slope on sides, 1: 125 slope on pond bottom
Leachate Collection:	Slotted 4-inch PVC drains within 1-foot sand layer
Leak Detection:	Monitoring wells connected to collection system
Secondary Containment:	6-inch clay liner beneath sand layer

This impoundment has been in use since 1987 (date of construction). There have been no liner leaks identified, and no liner repairs have been required. The liner material is compatible with the wastewater streams being discharged to the pond.

Figures 2B and 2C illustrate the impoundment design. The evaporation impoundment is configured with a leak detection/leachate collection system that is inspected monthly. The leachate collection system consists of slotted four-inch PVC Schedule 80 piping buried within a one-foot sand layer directly beneath the HDPE liner. Migration of contaminants into the subsurface is prevented by a six-inch layer of compacted clay located directly beneath the sand layer. The leak detection system consists of two monitoring wells, which are directly connected to the leachate collection piping.

Annual discharge to the impoundment is expected to be 600,000 gallons. Of this total, 540,000 gallons is contact water. All of the non-contact cooling tower blow-down is discharged to the impoundment. This non-contact water contributes the remaining 60,000 gallons of the pond's total discharge. The pond has a significantly greater capacity than is currently required for the annual wastewater discharge. A substantial portion of the pond bottom is dry throughout much of the year. A minimum freeboard of one foot is maintained.

Disposal of pipeline hydro-test water will occasionally be necessary. This is expected to occur no more than twice annually. The water will be discharged to the lined impoundment.

3.2 Off-site Disposal

Wastewater produced at the San Juan River Plant is not routinely disposed of off-site. As a contingency measure, in the unlikely event that effluent volumes exceed the capacity of the pond, the water could be transported to a permitted Class II disposal well, since the wastewaters have been deemed exempt from RCRA Subtitle C. Approval of the well operator and the NMOCD will be obtained prior to disposal of the impoundment's wastewater at an off-site disposal well.

3.3 Solid Wastes

Solid wastes generated at the San Juan River Plant include pigging sludge, used oil, used filter cartridges (amine, oil, glycol, and gas type), off-spec sulfur contaminated with soil, and domestic waste. WGR proposes the disposal methods identified in the following table:

SOLID WASTE	ANNUAL VOLUME	PROPOSED DISPOSAL METHOD
Pigging Sludge - RCRA Exempt	250 barrels	Treat at Envirotech's land treatment facility or treat on site.
Filter Elements for Gas, Oil, Amine, and Glycol, Off-spec sulfur/soil - RCRA Exempt	1,960 filters	Dry on concrete, bag, haul to San Juan County landfill located in New Mexico
Domestic Trash - RCRA Exempt	2,500 pounds	Haul to Waste Management landfill
Activated Alumina or Charcoal Materials - RCRA Exempt	15,000 pounds	Dispose dry on site in not more than 2" lifts in accordance with OCD approval dated April 14, 1992 (GW-33 Discharge Plan Modification)
Slightly Contaminated, Non-hazardous Soil	20 barrels	Treat at Envirotech's land treatment facility, treat on site, or landfill

RCRA Exempt = Classified as exempt from RCRA Subtitle C in accordance with 40CFR261.4(b)(5).

WGR has obtained Waste Management approval for disposal of filter-elements at Waste Management's landfill located in Cortez, Colorado. Annual renewals are required by Waste Management. WGR has obtained the necessary renewals for disposal. Wastes are manifested and/or tracked with appropriate contractors for transportation and disposal.

3.4 Recycled Materials

Approximately 9,000 gallons of used lubricating oil are produced at the plant per year. The used oil will be stored in drums at basin "B" and then transported to a recycling facility or sent to the condensate tank for sale as useful product, if contracts allow. Wastes are manifested and/or tracked with appropriate contractors for transportation and disposal.

4 SITE CHARACTERISTICS

The physical characteristics of the plant site have been studied in detail as part of a previously completed land application feasibility study completed in 1986 and 1987. Detailed information concerning site soil and ground water characteristics are presented in the Phase I and II reports, and should be consulted if more specific information is required than provided in the following summary.

4.1 Hydrologic Features

Surface water run-off from the plant site is expected to follow the local topographic contours. The topography slopes to the southwest across the majority of the site, although a south-southeasterly slope is apparent in the southeastern portion of the site and extends radially from Flare Hill in the northwestern portion of the site. The topographic gradient across most of the site is relatively flat (on the order of 0.01 feet/foot), with the exception of moderate to steep topographic gradients encountered on the flanks of Flare Hill. The infiltration rate of the majority of the surficial deposits is high (Sheppard soil = 8.9 in/hr). Therefore, large scale overland flow of surface runoff is not anticipated to occur under all but the most extreme storm or flood events.

Surface water bodies within a one-mile radius of the site include 1) the Stevens Arroyo (0.2 miles west), 2) the Farmers Mutual Ditch (0.5 miles south), and 3) small fresh water ponds located on the golf course south of the site. The Stevens Arroyo is an intermittent watercourse. The San Juan River is located greater than one mile south of the plant site.

Locations of local ground water wells are illustrated in Figure 3 of the 1991 Discharge Plan. Based on New Mexico State Engineer well records, all of these wells are completed within the shallow alluvial aquifer at approximately 75 feet below ground surface and are permitted for "domestic" water usage. Ground water is anticipated to discharge as a seep approximately 0.75 miles south of the site where the base of the alluvial aquifer is exposed.

Shallow ground water is contained within alluvial terrace gravel deposits beneath the site. The extent of the alluvial aquifer is shown in Figure 4 of the 1991 Discharge Plan. The alluvial sediments are underlain by greenish grey sediments of the Lower Shale Member of the Kirtland Shale. The Kirtland Shale is exposed in the extreme northern and western portions of the site, and approximately 0.5 miles south of the site. The thickness of the alluvial sediments varies from zero feet in the extreme northern and western portions of the site, to greater than 70 feet in the southern and eastern portions of the site. Depth to ground water varies across the site. It is estimated to be less than ten feet below the surface in the extreme northern and western portions of the site where the alluvial sediments are thin to nonexistent and greater than 50 feet in the extreme southern and eastern portions of the site. Regional ground water flow is to the southwest beneath the majority of the site, with local south to southeasterly flow in the southeast portion of the site.

4.2 Surface and Groundwater Quality

Groundwater samples from on-site monitoring wells and off-site local wells were analyzed for various water quality parameters as part of the Phase I and II feasibility study in 1987. Results

of these analyses indicate that WQCC standards for TDS, sulfate, and manganese are exceeded in on-site wells. TDS, sulfate, and chloride content exceed WQCC standards in all off-site wells. The average TDS for on-site wells is 4,500 mg/L and is 2,775 mg/L for local wells.

Background ground water quality can be assessed from water quality data obtained from the Daley well (the only local well not located down gradient from the plant site). It is interesting to note that the TDS concentration in the Daley well (4,300 mg/L) is higher than that of the local wells located down gradient of the plant site and is near the average TDS concentration for on-site wells (4,500 mg/L). This fact, in conjunction with the high chloride concentrations in the Daley well, suggest that background water quality is comparable to that beneath the plant site.

Surface water quality samples have been obtained from the Stevens Arroyo located west of the plant site. Background water quality from Stevens Arroyo reportedly exceeds 10,000 mg/L for TDS and, therefore, exceeds the WQCC limit for surface water.

5 CLOSURE PLAN COMMITMENT

WGR will commit to the preparation of a closure plan in accordance with the New Mexico Water Quality Control Commission regulation number 3107A.(11). At this time, WGR has no plans to close the existing impoundment wastewater system or the facility.

APPENDIX A

ANALYTICAL RESULTS

iml

Inter-Mountain Laboratories, Inc.

Phone (505) 326-4737 Fax (505) 325-4182

2506 West Main Street, Farmington, NM 87401

June 1, 2001

Charles Barr
Western Gas Resources, Inc.
P.O. Box 70
Kirtland, NM 87417

Mr. Barr:

Enclosed are the reports for the sample received by our laboratory for analysis on May 14, 2001.

If you have any questions concerning these analyses, please don't hesitate to call me at your convenience.

Sincerely,

Sharon Williams

Sharon Williams
Organic Analyst/IML-Farmington

Enclosures

xc: File

Inter-Mountain Laboratories, Inc.
Phone (505) 326-4737 Fax (505) 325-4182
2506 West Main Street, Farmington, NM 87401

WESTERN GAS RESOURCES

Case Narrative

On May 14, 2001, one sample was submitted to Inter-Mountain Laboratories - Farmington for analysis. The sample was received cool and intact. Analyses for Benzene-Toluene-Ethylbenzene-Xylenes (BTEX), TCLP Metals and pH was performed on the sample as per the accompanying Chain of Custody documents. The sample was analyzed within the required holding times.

BTEX analysis was performed by EPA Method 5030, Purge and Trap, EPA Method 8021B, Aromatic Volatile Hydrocarbons, using a Tekmar LSC 2000 Purge and Trap and a Hewlett-Packard 5890 Gas Chromatograph, equipped with a photoionization detector. No BTEX compounds were detected as indicated in the enclosed report.

TCLP Metals was performed by Method SW-846 – "Test Method for Evaluating Waste and Solid Waste: Physical/Chemical Methods", U.S.E.P.A., November, 1986.

It is the policy of this laboratory to employ, whenever possible, preparatory and analytical methods which have been approved by regulatory agencies.

Quality control data appear at the end of the analytical report and may be identified by title. If there are any questions regarding the information presented in this report package, please feel free to call me at your convenience.

Sincerely,

Sharon Williams
Organic Analyst/IML-Farmington

Inter·Mountain Laboratories, Inc.

2506 West Main Street
Farmington, NM 87401

Client: Western Gas Resources
Project: S.J. River Plant
Sample ID: #6 Down Hole
Lab ID: 0301W02268
Matrix: Water
Condition: Intact

Date Reported: 06/01/01
Date Sampled: 05/14/01
Date Received: 05/14/01

Date Analyzed: 05/22/01

Parameter	Analytical Result	PQL	MCL	Units
TCLP Metals - Method 1311				
Arsenic	<0.1	0.1	5.0	mg/L
Barium	<0.5	0.5	100	mg/L
Cadmium	<0.01	0.01	1.0	mg/L
Chromium	<0.02	0.02	5.0	mg/L
Lead	<0.1	0.1	5.0	mg/L
Mercury	<0.01	0.01	0.2	mg/L
Selenium	<0.1	0.1	1.0	mg/L
Silver	<0.05	0.05	5.0	mg/L

Reference: SW-846 - "Test Methods for Evaluating Solid Waste: Physical/Chemical Methods", United States Environmental Protection Agency, November, 1986.

Reviewed By: _____
William Lipps

Inter·Mountain Laboratories, Inc.

2506 West Main Street
Farmington, NM 87401

Client: Western Gas Resources
Project: S.J. River Plant
Sample ID: #6 Down Hole
Lab ID: 0301W02268
Matrix: Water
Condition: Intact

Date Received: 05/14/01
Date Reported: 06/01/01
Date Sampled: 05/14/01
Time Sampled: 1430

Parameter	Analytical Result	Units	Units	PQL	Method	Analysis Date	Time	Init.
General Parameter								
PH	7.3	s.u.		0.1	EPA 150.1	05/14/01	1600	SW

Reference: Method 8021b, Volatile Organic Compounds, Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, United States Environmental Protection Agency, SW-846, Volume IB.

Reviewed By:

William Lipps

Inter-Mountain Laboratories, Inc.

2506 West Main Street
Farmington, NM 87401

Client: Western Gas Resources
Project: S.J. River Plant
Sample ID: #6 Down Hole
Lab ID: 0301W02268
Matrix: Water
Condition: Intact

Date Reported: 05/30/01
Date Sampled: 05/14/01
Date Received: 05/14/01
Date Extracted: N/A

Parameter	Analytical Result	PQL	Units
BTEX - Method 8021B			
Benzene	<1	1	µg/L
Toluene	<1	1	µg/L
Ethylbenzene	<1	1	µg/L
Xylenes (total)	<3	3	µg/L

Quality Control - Surrogate Recovery	%	QC Limits
4-Bromofluorobenzene(SUR-8021B)	90	70 - 130
a,a,a-Trifluorotoluene(SUR-8021B)	93	70 - 130

Reference: Method 8021b, Volatile Organic Compounds, Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, United States Environmental Protection Agency, SW-846, Volume IB.

Reviewed By: _____
William Lipps

Analyst: _____

QUALITY CONTROL / QUALITY ASSURANCE

Inter Mountain Laboratories, Inc.
Phone (505) 326-4737 Fax (505) 325-4182
2506 West Main Street, Farmington, NM 87401

Quality Control / Quality Assurance

Spike Analysis / Blank Analysis

TOXICITY CHARACTERISTIC LEACHING PROCEDURE

Client:	Western Gas Resources	Date Reported:	06/01/01
Project:	S.J. River Plant	Date Analyzed:	05/22/01
Sample Matrix:	Water	Date Received:	05/14/01

Spike Analysis

Parameter	Spike Result (mg/L)	Sample Result (mg/L)	Spike Added (mg/L)	Percent Recovery
Arsenic	0.02	<0.1	0.02	110%
Barium	0.87	<0.5	1.00	87%
Cadmium	0.024	<0.01	0.025	98%
Chromium	0.11	<0.02	0.10	110%
Lead	0.10	<0.1	0.10	100%
Mercury	0.022	<0.01	0.002	114%
Selenium	0.025	<0.1	0.025	99%
Silver	0.10	<0.05	0.10	102%

Method Blank Analysis

Parameter	Result	Detection Limit	Units
Arsenic	ND	0.1	mg/L
Barium	ND	0.5	mg/L
Cadmium	ND	0.01	mg/L
Chromium	ND	0.02	mg/L
Lead	ND	0.1	mg/L
Mercury	ND	0.01	mg/L
Selenium	ND	0.1	mg/L
Silver	ND	0.05	mg/L

References: Method 1311: Toxicity Characteristic Leaching Procedure, SW-846, Rev. 0, July 1992.

Method 3010A: Acid Digestion of Aqueous Samples and Extracts for Total Metals, SW-846, Rev. 1, July 1992.

Comments:

Reported by _____

Reviewed by _____

Inter-Mountain Laboratories, Inc.
Phone (505) 326-4737 Fax (505) 325-4182
2506 West Main Street, Farmington, NM 87401

Quality Control / Quality Assurance

Known Analysis

TOXICITY CHARACTERISTIC LEACHING PROCEDURE

Client:	Western Gas Resources	Date Reported:	06/01/01
Project:	S.J. River Plant	Date Analyzed:	05/22/01
Sample Matrix:	Water	Date Received:	05/14/01

Known Analysis

Parameter	Found Result	Known Result	Percent Recovery	Units
Arsenic	0.039	0.040	98%	mg/L
Barium	1.94	2.00	97%	mg/L
Cadmium	1.95	2.00	98%	mg/L
Chromium	1.97	2.00	99%	mg/L
Lead	1.93	2.00	97%	mg/L
Mercury	0.003	0.003	108%	mg/L
Selenium	0.020	0.020	100%	mg/L
Silver	0.23	0.25	92%	mg/L

References: Method 1311: Toxicity Characteristic Leaching Procedure, SW-846, Rev. 0, July 1992.

Method 3010A: Acid Digestion of Aqueous Samples and Extracts for Total Metals, SW-846, Rev. 1, July 1992.

Comments:

Reported by _____

Reviewed by _____

Inter·Mountain
Laboratories, Inc.

2506 West Main Street
Farmington, New Mexico 87401
Tel. (505) 326-4737

James Fleak
Western Gas Resources, Inc.
12200 N. Pecos Street
Denver, Co. 80234

26 November 1996

Mr. Fleak:

Enclosed please find the reports for the sample received by our laboratory for analysis on November 19, 1996.

If you have any questions about the results of these analyses, please don't hesitate to call me at your convenience.

Sincerely,

Sharon Williams
Organic Analyst Supervisor

Enclosures

xc: Kent McEvers
File

Inter-Mountain Laboratories, Inc.

2506 W. Main Street
Farmington, New Mexico 87401

Client: Western Gas Resources
Project: Kirtland, NM
Sample ID: Lab Waste
Laboratory ID: 0396G02513
Sample Matrix: Liquid
Condition: Intact

Date Reported: 11/26/96
Date Sampled: 11/19/96
Date Received: 11/19/96

Analyte	Result	Units
Ignitability	>140	° F
Corrosivity (pH)	8.82	
Barium	<0.01	ppm
Reactive Cyanide	<0.010	ppm
Reactive Sulfide	<0.01	ppm

Reg. Level = 100 ppm

ND - Analyte not detected at stated detection level.

References:

Analysis performed according to SW-846 "Test Methods for Evaluating Liquid/Solid Waste: Physical/Chemical Methods" United States Environmental Protection Agency 3rd Edition, final Update II, September, 1994.

ASTM Annual Book of Standards

Reported by: _____

Reviewed by: _____

Inter-Mountain Laboratories, Inc.

2506 W. Main Street
Farmington, New Mexico 87401

Quality Control / Quality Assurance

Known Analysis / Method Blank Analysis / Spike Analysis

TOTAL METALS

Client: Western Gas Resources
Project: Kirtland
Sample Matrix: Liquid

Date Reported: 11/26/96
Date Analyzed: 11/25/96
Date Received: 11/19/96

Parameter	Found Result	Known Result	Units	Percent Recovery	Acceptance Limits
Barium	0.98	1.00	mg/L	98%	90-110%

Method Blank Analysis

Parameter	Result	Detection Limit	Units
Barium	ND	0.01	mg/L

Spike Analysis

Parameter	Spike Result (mg/L)	Sample Result (mg/L)	Spike Added (mg/L)	Percent Recovery	Acceptance Limits
Barium	0.55	<0.01	1.00	*55%	85-115%

Reference: Analysis performed according to SW-846 "Test Methods for Evaluating Solid Waste: Physical / Chemical Methods" United States Environmental Protection Agency 3rd Edition, Final Update II, September, 1994.

ASTM Annual Book of Standards

Comments: *Spike did not recover due to matrix interference such as sulfate.

Reported by: _____

Reviewed by: _____

Inter·Mountain Laboratories, Inc.

2506 W. Main Street
Farmington, New Mexico 87401

Quality Control / Quality Assurance

Known Analysis
FLASH POINT

Client:	Western Gas Resources	Date Reported:	11/26/96
Project:	Kirtland	Date Analyzed:	11/22/96
Sample Matrix:	Liquid	Date Received:	11/19/96

Parameter	Found Result	Known Result
p-Xylene	76°F	77°F

Reference: Analysis performed according to SW-846 "Test Methods for Evaluating Solid Waste: Physical / Chemical Methods" United States Environmental Protection Agency 3rd Edition, Final Update II, September, 1994.

ASTM Annual Book of Standards

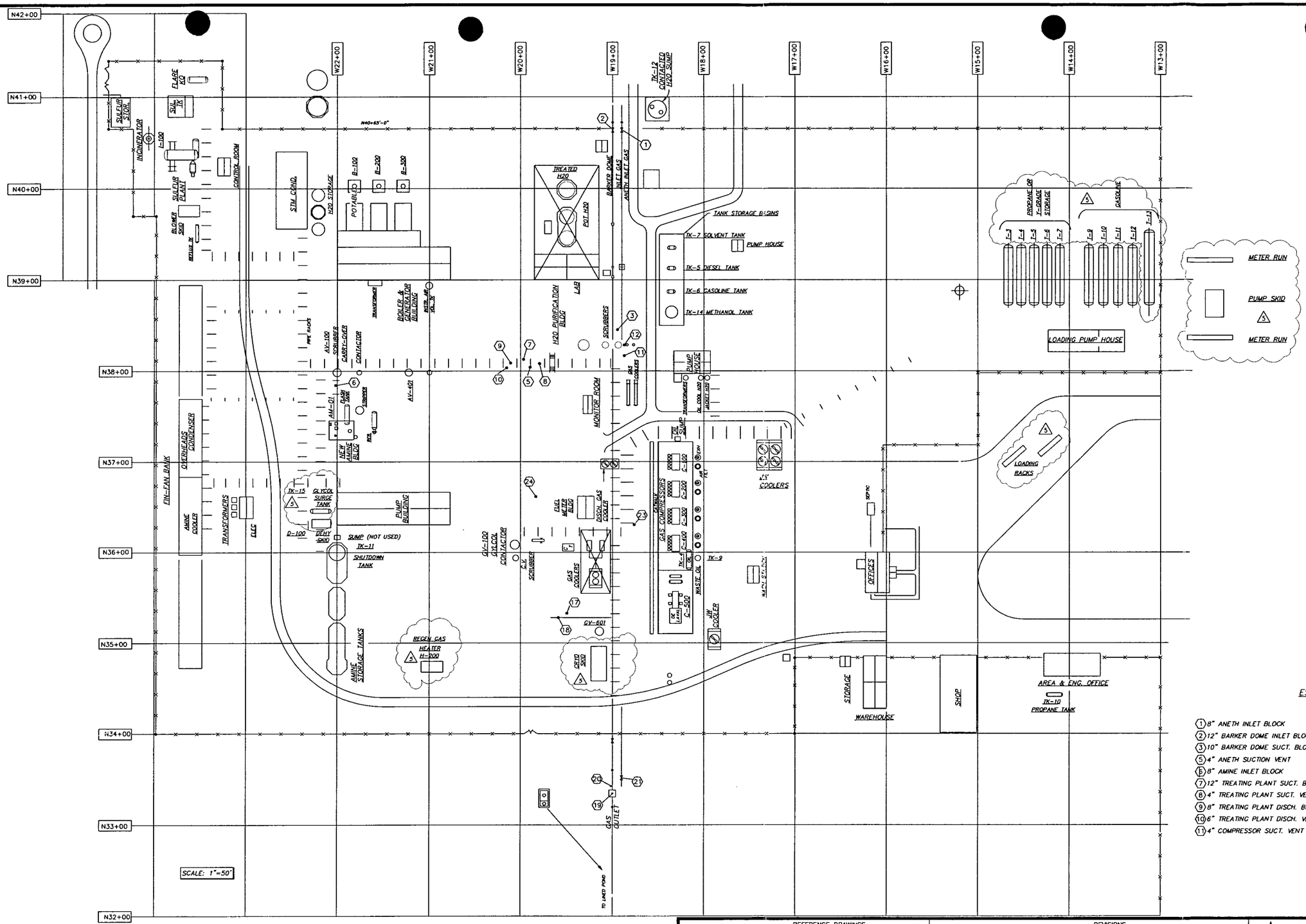
Comments:

Reported by _____

Reviewed by _____

APPENDIX B

FIGURES



ESD Valve Legend

(1) 8" ANETH INLET BLOCK	(12) 4" COMPRESSOR DISCH. VENT
(2) 12" BARKER DOME INLET BLOCK	(17) 4" DEHY. PLANT SUCT. VENT
(3) 10" BARKER DOME SUCT. BLOCK	(18) 16" DEHY. PLANT SUCT. BLOCK
(5) 4" ANETH SUCTION VENT	(19) 24" PLANT DISCHARGE BLOCK
(6) 8" AMINE INLET BLOCK	(20) 6" PLANT DISCHARGE VENT
(7) 12" TREATING PLANT SUCT. BLOCK	(21) 2" FUEL GAS BLOCK
(8) 4" TREATING PLANT SUCT. VENT	(23) 4" SUCTION HEADER VENT
(9) 8" TREATING PLANT DISCH. BLOCK	(24) 2" FUEL GAS VENT
(10) 6" TREATING PLANT DISCH. VENT	(31) 4" COMPRESSOR GAS BLOCK
(11) 4" COMPRESSOR SUCT. VENT	(32) 2" COMPRESSOR GAS VENT

FIGURE 1A

NOTES:

1.) LOCATIONS OF NEW ADDITIONS TO BE FIELD VERIFIED.

REFERENCE DRAWINGS		REVISIONS						
		5	ADDED AS-BUILTS (SEE NOTE 1)	LGA	10/20/99	DLJ	12/20/99	PM 10/20/99
		4	REVISED PER KENTS MARK-UPS	CA	11/1/94			
		3	REVISED PER FIELD	CA	2/14/94			
		2	REVISED PER FIELD MARK-UPS	PE	8-19-94			
		1	REVISED PER KENT'S MARK-UPS	AB	11-15-93	DJ		
		0	FOR APPROVAL					
DWG. NO.	TITLE	NO.	DESCRIPTION	BY	DATE	CHK	DATE	APPR DATE

Western Gas Resources, Inc.
12200 N. Pecos St. - Denver Colorado 80234 - (303) 452-5603

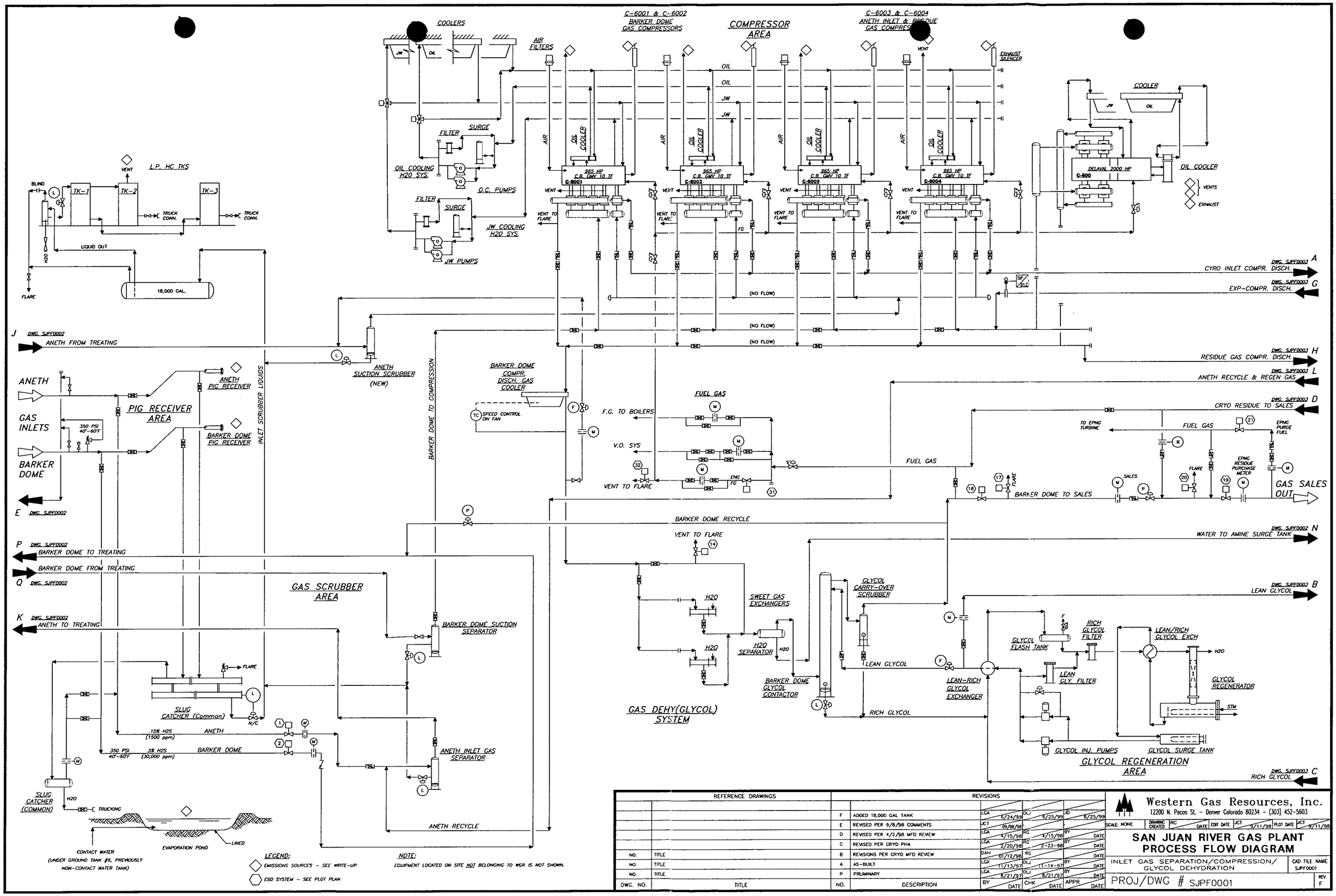
SCALE: 1"=50'	DRAWING CREATED	ORDES 5/11/92	EDIT DATE	ORDES 2/2/00	PLOT DATE	2/2/00

SAN JUAN RIVER PLANT
PLOT PLAN

OIL & GAS SYSTEMS DESIGN CO.
CASPER, WYOMING

CAD FILE NAME SJPP0100

PROJ/DWG # SJPP0100 REV 5



REFERENCE DRAWINGS			REVISIONS						
		F	ADDED 18,000 GAL TANK	LGA	5/24/99	DLJ	8/25/99	JD	8/25/99
		E	REVISED PER 9/8/98 COMMENTS	JCT	09/08/98				
		D	REVISED PER 4/2/98 MFD REVIEW	LGA	4/15/98	RC	4/15/98	BY	DATE
		C	REVISED PER CRYO PHA	LGA	2/20/98	RC	2-23-98	BY	DATE
NO.	TITLE	B	REVISIONS PER CRYO MFD REVIEW	DAH	01/12/98	RC		BY	DATE
NO.	TITLE	A	AS-BUILT	LGA	11/13/97	DLJ	11-14-97	BY	DATE
NO.	TITLE	P	PRLIMINARY	LGA	8/21/97	DLJ	8/21/97	BY	DATE
DWG. NO.	TITLE	NO.	DESCRIPTION	BY	DATE	CHK	DATE	APPR	DATE

Western Gas Resources, Inc.
12200 N. Pecos St. - Denver Colorado 80234 - (303) 452-5603

SCALE: NONE | DRAWING CREATED RC DATE | EDIT DATE JCT 9/11/98 | PLOT DATE JCT 9/11/98

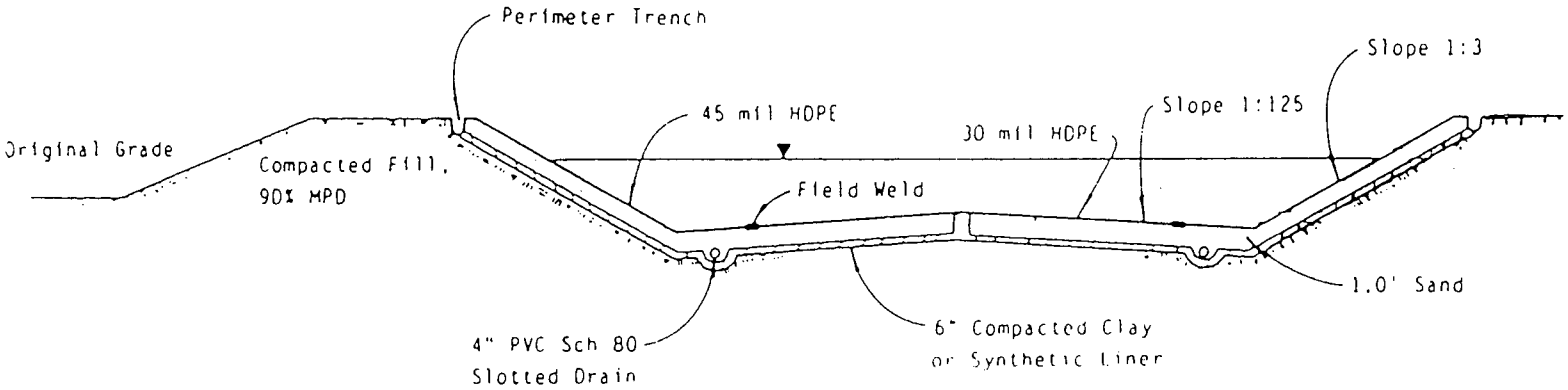
SAN JUAN RIVER GAS PLANT PROCESS FLOW DIAGRAM

INLET GAS SEPARATION/COMPRESSION/ GLYCOL DEHYDRATION

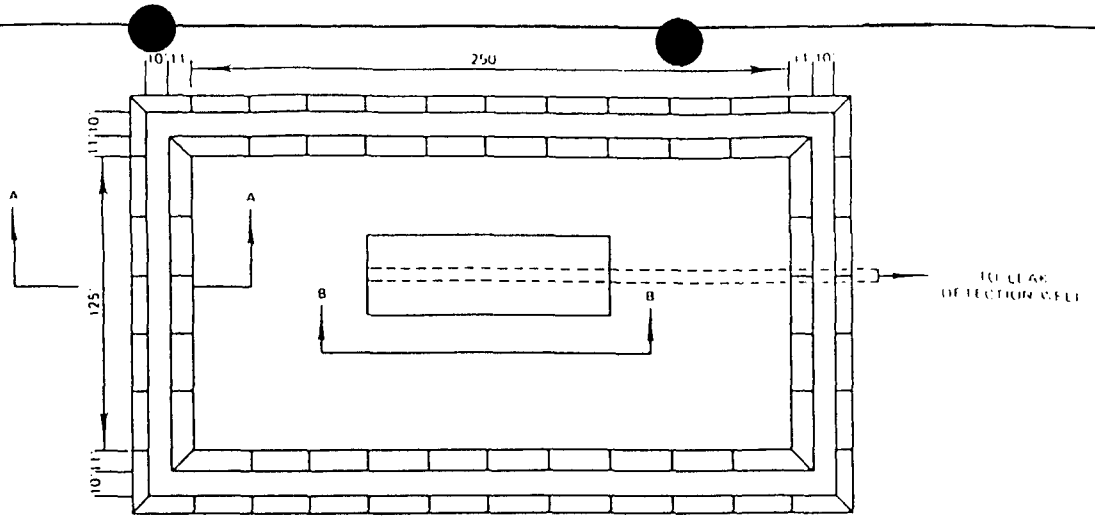
CAD FILE NAME SJPF0001

PROJ/DWG # SJPF0001

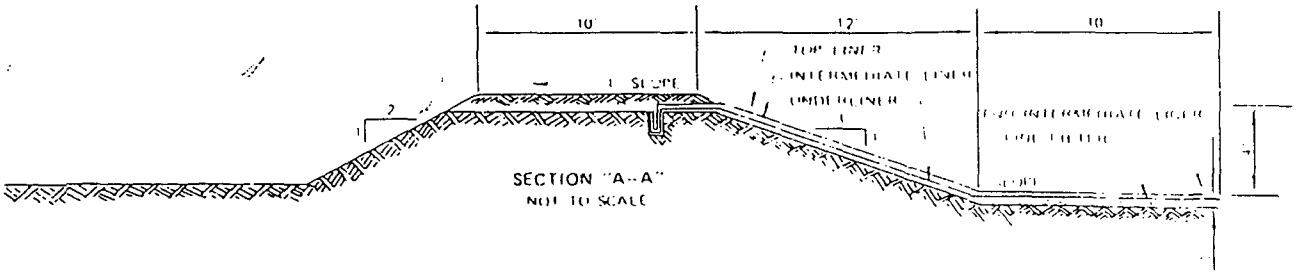
REV F

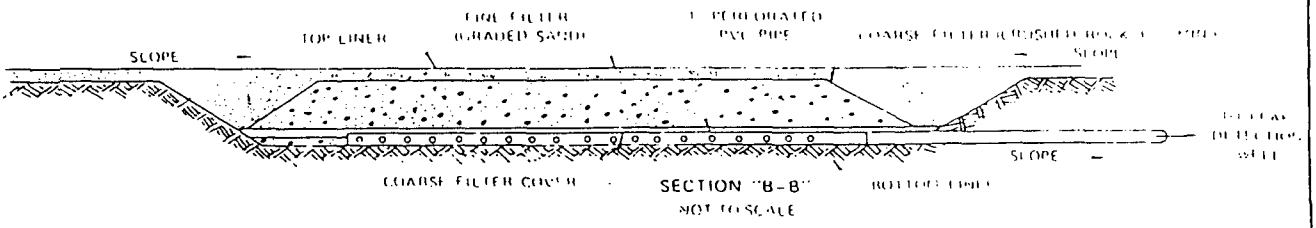


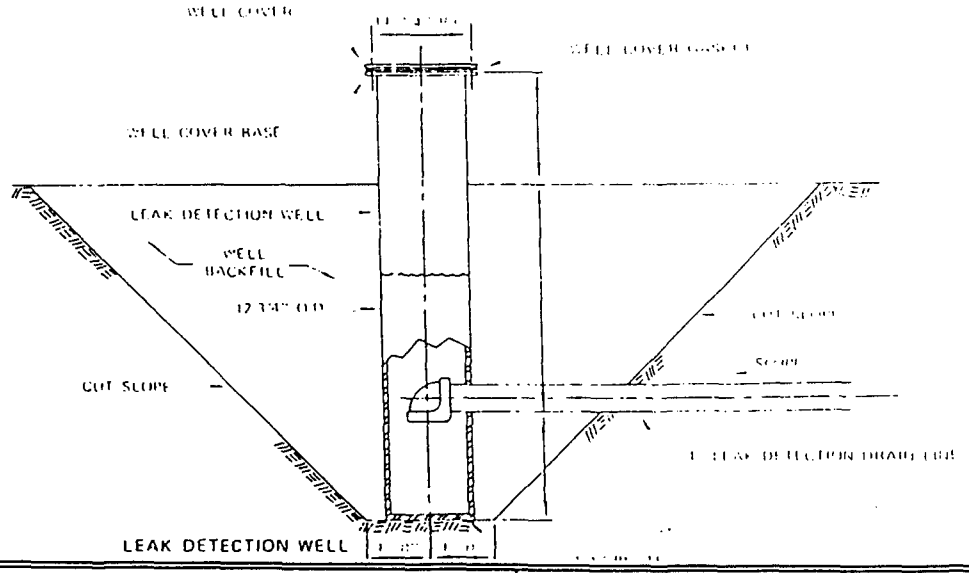
DISCHARGE PLAN WESTERN GAS RESOURCES, INC. SAN JUAN RIVER PLANT San Juan County, New Mexico September, 1991	EVAPORATION POND DESIGN Figure 2B
Modified from El Paso Natural Gas Company Discharge Plan	Scale: None



SAN JUAN RIVER PLANT EVAPORATION POND







DISCHARGE PLAN WESTERN GAS RESOURCES, INC. SAN JUAN RIVER PLANT San Juan County, New Mexico September, 1991	EVAPORATION POND DESIGN Figure 2C
Modified from El Paso Natural Gas Company Discharge Plan	Scale: None

APPENDIX C

SPILL PROVENTION CONTROL AND COUNTERMEASURE PLAN

SPILL PREVENTION CONTROL AND COUNTERMEASURE PLAN

FOR

San Juan Plant

Section 1, T29N, R15W

San Juan County, New Mexico

February 15, 2000

Prepared By:

Western Gas Resources, Inc.
12200 N. Pecos Street
Denver, Colorado 80234

PLAN EXPIRES: 02/15/03

Revised 10/19/1999

Spill Prevention Control and Countermeasure Plan

San Jose River Plant

MAY 17, 2001 – Send to JAMES Flook.

Changes

TK 4 Change to TK 8902

TK 9 Change to TK 8901

TK 15 Change to GV 500

TK 15 top tank - water on Hill

TK 16 Bottom TANK – water on Hill

TK 14 tank size 750 gal to 1000 gal.
in ethanol ~~tank~~

GENERAL INFORMATION

SPCC Plan Status:	**New**
Facility/System Name:	**San Juan Plant**
Facility Type:	**Natural Gas Processing Plant**
Facility Address:	**99 Road 6500** **Kirtland, New Mexico 87417**
Nearest City/Town:	**Kirtland, New Mexico**
Distance and Direction to Nearest City/Town:	**1/2 mile north of Kirtland, 6 3/4 miles west of Farmington**
Facility or System Manager/Supervisor:	**Kent McEvers**
Manager's/Supervisor's Address:	**99 Road 6500** **Kirtland, New Mexico 87417**
Phone Number:	**(505) 598-5601**
Person Responsible for Spill Control (§112.7(e)(10)(ii):	**Kent McEvers**
Phone Number:	**(505) 598-5601**
Environmental Engineer:	**Ron LePlatt**
Phone Number:	**(303) 252-6237**

Spill Events (§112.7(a))

"Spill event" means a discharge of oil into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities, as defined at 40 CFR Part 110.

Did the facility or system experience a reportable spill event during the 12-months prior to January 10, 1974 (effective date of 40 CFR, Part 112)? **Unknown**

If yes, complete Appendix A which provides details of each spill, describes the corrective action taken, and discusses plans for preventing recurrence.

GENERAL INFORMATION (cont.)

Management Approval (§112.7):

This Spill Prevention Control and Countermeasure Plan will be implemented as herein described.

Signature: Kent McEvers

Name: **Kent McEvers**

Title: **Area Manager**

Date: 2/24/00

Professional Engineer's Certification (§112.3(d)):

I, hereby, certify that I have examined the facility, and being familiar with the provisions of 40 CFR, Part 112, attest that this Spill Prevention Control and Countermeasure Plan has been prepared in accordance with good engineering practices.

Phillip L. Moyer

(Seal)

Phillip L. Moyer
Printed Legal Name of Registered Professional Engineer

Date: 2/15/00

Registration No.: **31337**
State of Registration: **Colorado**

GENERAL INFORMATION (cont.)

Facility Description *(Describe the facility's history, day-to-day operation, hours of operation, number of personnel, products produced, products used and method of shipping and receiving products.)*

Western Gas Resources, Inc.'s (Western) San Juan River Plant is a natural gas sweetening, sulfur recovery and natural gas liquids (NGL) recovery plant located in Kirtland, New Mexico. The plant receives gas from the Aneth and Barker Dome fields. The H_2S content of the incoming gas varies from 500 to 2,000 ppmv in the Aneth field and 5,000 to 70,000 ppmv in the Barker Dome field. The gas is treated through several processes that include hydrocarbon/water separation, amine sweetening, glycol dehdration, sulfur recovery and cryogenic NGL recovery.

By-products from gas processing include saleable natural gas and natural gas liquids, natural gas condensate, liquid sulfur, waste water, acid gas and low sulfur content off-gas. Saleable natural gas and natural gas liquids are shipped from the site via sales pipelines. Natural gas condensate is haul by truck to a local refiner. Liquid sulfur is hauled off-site by truck. Waste waters produced at the site are pumped to an on-site evaporation pond or disposed off-site. Acid gas is combusted in the on-site incinerator and the low sulfur content off-gas is used as supplemental fuel or combusted in the plant flare.

Storage vessels at the plant include a 400 bbl condensate/water storage tank (TK-1), a 400 bbl condensate tank (TK-2), a 250 bbl waste water storage tank (TK-3), a 1,000 gallon lube oil storage tank (~~TK-4~~ TK8902), a 300 gallon diesel fuel storage tank (TK-5), a 300 gallon gasoline storage tank (TK-6), a 500 gallon hydrocarbon solvent storage tank (TK-7), a 350 gallon waste oil storage tank (~~TK-9~~ TK8901), a 100 bbl propane storage tank (TK-10), a normally empty 1,035 bbl DEA storage tank (TK-11), a ~~750~~ 1000 gallon methanol storage tank (TK-14), a 2,244 gallon triethylene glycol storage tank (~~TK-15~~ TV520), three out of service 1,000 bbl propane or y-grade storage tanks (T3 - T5), two out of service 1,000 bbl butane storage tanks (T6 and T7), four out of service 1,000 bbl gasoline storage tanks (T9 - T12), an out of service 2,500 gallon gasoline storage tank (T13), a 350 bbl pigged liquids tank (T0-1), a 430 bbl hydrocarbon storage tank (T0-2), a 120 bbl water storage tank (T0-3), and a ~~750~~ 1000 gallon methanol storage tank. Removed Feb. 16, 2000

Electrical power is supplied by a local utility. Potable water is supplied by the local water user's association. Sanitary waste is disposed in an on-site septic system.

The plant is operated 24 hours per day, seven days per week and employs eight full time personnel.

Drainage Pathway and Distance to Navigable Waters *(Identify drainages and surface water bodies that may be impacted by a release from the site including the distance to the drainage and surface water bodies and direction of flow)*

Drainage from the facility predominantly flows to the northwest past Flare Hill then west and

southwest to Stevens Arroyo, across the Farmers Mutual Ditch and on to the San Juan River. The straight line distance from the facility to the San Juan River is approximately 2.0 miles to the south. Actual travel distance is approximately 3.8 miles.

Potential Failure Assessment (§112.7(b))

The following table identifies the major potential failure scenarios at the facility. For each failure scenario, the direction, rate of flow and total quantity of oil released is specified in the table.

Type of Failure (Rupture, Overflow, Overfill, etc.)	Direction of Release	Rate of Flow (gallons per minute)	Total Release Volume (gallons)
Condensate/Water Tank (TK-1) rupture, overfill or valve failure.	Tank is within diked area suitable to contain 110 percent of tank volume.	70 to 43,000 gpm	8,400 to 14,400 gallons
Condensate Tank (TK-2) rupture, overfill or valve failure.	Tank is within diked area suitable to contain 110 percent of tank volume.	70 to 43,000 gpm	8,400 to 14,400 gallons
Water Tank (TK-3) rupture, overfill or valve failure.	Tank is within diked area suitable to contain 110 percent of tank volume.	70 to 43,000 gpm	8,400 to 8,800 gallons
Lube Oil Tank (TK-4) rupture, overfill or valve failure. New Number TK 8902	Tank is located inside compressor building. Release would flow east to the outside of the building and pond along building foundation.	25 to 3,000 gpm	250 to 1,000 gallons
Diesel Fuel Tank (TK-5) rupture, overfill or valve failure.	Tank is located within concrete dike that is more than sufficient to contain the tank volume.	63 to 1,800 gpm	125 to 300 gallons
Gasoline Tank (TK-6) rupture, overfill or valve failure.	Tank is located within concrete dike that is more than sufficient to contain the tank volume.	63 to 1,800 gpm	125 to 300 gallons
Hydrocarbon Solvent Tank (TK-7) rupture, overfill or valve failure.	Tank is located within concrete dike that is more than sufficient to contain the tank volume.	73 to 3,000 gpm	125 to 500 gallons
Waste Oil Tank (TK-9) rupture, overfill or valve failure. New Number TK 8901	Tank is located within a stock tank so any release would be contained.	81 to 2,100 gpm	125 to 350 gallons
Propane Tank (TK-10) rupture, overfill or valve failure. NO LONGER TANK (Oct. 5, 2001) New Vessel MP2 (see pic)	Tank contents would volatilize resulting in insignificant discharge to ground surface	n/a	4,113 gallons
Diethanolamine Tank (TK-11) rupture or valve failure.	Tank is only used when amine system is down. Release from this tank would flow radially away from the tank.	503 to 43,453 gpm	43,453 gallons

GENERAL INFORMATION (cont.)

Type of Failure (Rupture, Overflow, Overfill, etc.)	Direction of Release	Rate of Flow (gallons per minute)	Total Release Volume (gallons)
Propane or Y-grade tanks (T3 - T5) rupture, overfill or valve failure.	Rupture, overfill or valve failure will result in negligible discharge of liquids to the ground surface. Contents will volatilize. Tank are out of service.	n/a	42,000 gallons
Butane tanks (T6 - T7) rupture, overfill or valve failure.	Rupture, overfill or valve failure will result in a portion of tank contents contacting the ground surface and dispersing in a north-northwest direction. Majority of contents will volatilize. Tanks are out of service.	25 to 4,000 gpm	42,000 gallons
Gasoline tanks (T9 - T12) rupture, overfill or valve failure.	Rupture, overfill or valve failure will result in discharge to the ground suface dispersing in a north-northwest direction. Tanks are out of service.	50 to 40,000 gpm	500 to 42,000 gallons
Gasoline Storage Tank (T13) rupture, overfill or valve failure.	Rupture, overfill or valve failure will result in discharge to the ground suface dispersing in a north-northwest direction. Tank is out of service.	50 to 50,000 gpm	500 to 100,000 gallons
Pigged Liquids Tank (T0-1) rupture,overfill or valve failure. Red tank	Rupture, overfill or valve failure will result in discharge to the ground surface. Flow will be to the northwest. Tank is pressurized to 250 to 500 psi.	100 to 14,700 gpm	2,000 to 14,700 gallons
Hydrocarbon Surge Tank (T0-2) rupture, overfill or valve failure. yellow tank	Tank is located within lined dike that has sufficient capacity to contain 110 percent of tank volume.	50 to 18,000 gpm	500 to 18,000 gallons
Water Tank (T0-3) rupture, overfill, or valve failure. Removed Feb. 16, 2000	Tank is located within the evaporation pond off the southeast corner of the site. Releases from this tank would drain into the evaportation pond.	50 to 5,040 gpm	500 to 5,040 gallons
Methanol Tank (TK-14) rupture, overfill or valve failure.	Tank is located within concrete dike that is more than sufficient to contain the tank volume.	25 to 4,500 gpm	125 to ~~750~~ 1000 gallons
Glycol Surge Tank (TK-15) rupture, overfill or valve failure. New Number GV 500	Tank is located west of pump building. Release from glycol surge tank would flow to the east into the treating plant building.	50 to 5,000 gpm	2,244 gallons
Truck Loading Area - Product Storage	Releases from the truck loading area would flow to the northwest. Limited containment within the truck loading area exists. Truck loading area is currently out of service.	50 to 5,000 gpm	50 to 10,000 gallons
Truck Loading Area - Inlet Liquids	Releases from truck loading area would flow to the northeast.	50 to 5,000 gpm	50 to 14,400 gallons

Appropriate Containment and/or Diversion Structures (§112.7(c))

The following table identifies the appropriate containment and/or diversionary structures to prevent releases from entering or potentially entering a navigable water and/or a waters of the state.

If containment or diversion structures or equipment to prevent oil from reaching navigable waters (or waters of the state) are not practicable, complete Appendix B (§112.7(d)).

Release Source	Containment and/or Diversion Structure	Comment
Miscellaneous Product Drums	Absorbent pads, snakes and loose absorbent are used for spill containment. No permanent structures are in place.	Where practical, drums are kept inside. Inspections are conducted daily. Absorbent materials are stored within 100 feet of product drums in order to provide prompt response.
Compressor Engine Oil Leakage	Absorbent pads, snakes and loose absorbent are used for spill containment. Some compressors have limited containment integrated in the skid.	Compressor engines are located within buildings. Inspections are conducted daily. Absorbent materials are stored within 50 feet of compressor engines in order to provide prompt response.
Condensate/Water Tank (TK-1), Condensate Tank (TK-2) and Water Tank (TK-3)	Tanks are located within earthen berm that is sufficient to contain 110 percent of the volume the largest tank volume.	In the event a release occurs that requires soil excavation and tank removal, the earthen berm shall be reconstructed using a minimum 10-mil thick HDPE liner or equivalent. The liner shall be installed to provide complete containment (i.e., the liner shall extend under the tanks).
Lube Oil Tank (~~TK-4~~) TK 8902	Absorbent pads, snakes and loose absorbent are used for spill containment. Slotted grates are in place to divert releases to sump.	Lube Oil storage tanks is located within the compressor building and is inspected daily. Absorbent materials are stored within 50 feet of the tank for quick response.
Diesel Fuel Tank (TK-5), Gasoline Tank (TK-6), Hydrocarbon Solvent Tank (TK-7) and Methanol Tank (TK-14)	Tanks are located within concrete storage basin and releases would be contained within the basin.	Visual inspections of tanks are made monthly. Spills shall be cleaned up immediately upon detection using absorbent pad, snakes and vacuum trucks as necessary.
Waste Oil Tank (~~TK-9~~) TK 8901	Waste oil tank is located within a stock tank of sufficient volume to contain at least 110 percent of the waste oil tank volume.	Water accumulation within the stock tank shall be removed periodically. Stock tank shall be visually inspected on a monthly basis.
Propane Tank (TK-10)	No containment or diversion structures are necessary.	
Diethanolamine Tank (TK-11)	No containment or diversion structures are in place.	Tank is in limited service and only used when amine system is down. When in service, tank shall be inspected monthly. In the event of a release, containment would be achieved by creating a perimeter ditch or berm with surrounding soils.
Propane or Y-grade Tanks (T3 - T5)	No containment or diversion structures are in place and are not necessary because contents will volatilize. Tanks are out of service.	
Butane Tanks (T6 - T7)	No containment or diversion structures are in place. Majority of contents will volatilize. Tanks are out of service.	In the event tanks are brought back into service, an HDPE-lined earthen berm will be constructed as shown on Figure 2 in Appendix F. The berm will be a minimum of 18-inches high.

Release Source	Containment and/or Diversion Structure	Comment
Gasoline Tanks (T9 - T12)	No containment or diversion structures are in place. Tanks are out of service.	In the event tanks are brought back into service, an HDPE-lined earthen berm will be constructed as shown on Figure 2 in Appendix F. The berm will be a minimum of 18-inches high.
Gasoline Storage Tank (T13)	No containment or diversion structures are in place. Tank is out of service.	Tank will not be placed back into service.
Pigged Liquids Tank (T-01)	No containment or diversion structures are in place. Releases would be captured at the catch pond on the northwest corner of the property.	Tank contents is transferred expeditiously. Inspections are made monthly and tank is elevated to be able to visually inspect.
Hydrocarbon Surge Tank (T-02)	Tank is located within an HDPE-lined dike that has sufficient capacity to contain at least 110 percent of the tank volume.	Accumulated water shall be periodically removed from the diked area.
Water Tank (T-03)	Tank release would drain into the evaporation pond.	Removed Feb. 16, 2000
Glycol Surge Tank ~~(TK-15)~~ T-1500	No containment or diversion structures are in place.	In the event of a release, containment would be achieved by creating a perimeter ditch or berm with surrounding soils.
Truck Loading Area - Product Storage	Limited containment is present at the truck loading area in the form of a concrete curb and gutter. Truck loading area is currently out of service.	In the event the truck loading area is brought back into service, an HDPE-lined earthen berm a least 18-inches high will be constructed around the truck loading area as shown on Figure 2 in Appendix F.
Truck Loading Area - Inlet	An HDPE-lined earthen berm is in place to contain releases from loading operations.	Absorbent materials and pumps, as necessary, will be used to aid in cleanup of releases.
Other Product Loading/Unloading Areas	No containment or diversion structures are in place, however, procedures are established to minimize the potential for a release. Absorbent pads, snakes and loose absorbent are used for spill containment.	Absorbent materials shall be on hand in the event a release or spill occurs.

Inspection and Records (§112.7(e)(8))

1. Do the required inspections follow written procedures? **Yes**

2. Are the written procedures signed by the appropriate supervisor or inspector? **Yes**

3. Are the written procedures attached to this plan? **Yes**

   If no, where are the written procedures located?

4. Are the inspection records signed by the appropriate supervisor or inspector? **Yes**

5. Are the inspection records attached to this plan? **Yes**

If no, where are the inspection records located?

6. Discuss whether the inspection procedures are adequate. Identify any deficiencies and make recommendations as necessary.

Inspection procedures were developed as part of this plan and are, therefore, considered to be adequate.

Personnel Training and Spill Prevention Procedures (§112.7(e)(10))

1. Are facility personnel properly trained in the operation and maintenance of equipment and procedures to prevent oil discharges? **Yes**

Describe training program and discuss any deficiencies with training.

Quarterly written training materials will be presented during safety/environmental huddles.

2. Are facility personnel educated regarding the applicable pollution control laws, rules and regulations? **No**

Discuss methods of instruction and describe level of understanding.

Personnel will be trained on various aspects of the laws, rules and regulations during quarterly training sessions.

3. Are regularly scheduled briefings conducted to assure adequate understanding of the SPCC Plan? **Yes**

Describe the type of information discussed in the scheduled briefings.

Briefings cover laws, rules, regulations and practical methods for spill control. Briefings also stress that spill control is everyone's responsibility.

Facility Drainage (§112.7(e)(1))

1. Describe drainage control procedures from diked storage areas, including operation of valves, pumps, sumps, etc. Note that flapper-type valves should not be used.

During monthly inspections, diked areas containing liquids will be observed for free product and oil sheen. Pumps will be used to remove water that does not contain free product or a sheen. This water would be discharged to the ground surface. Vacuum trucks or pumps will be used to remove free product. Free product will be

re-introduced into the process or disposed appropriately. Booms and skimmer pads will be used to remove sheens. Water impacted by free product or a sheen cannot be discharged to the ground surface. This water must be disposed off-site at an approved facility. All removals will be attended by a supervisor or inspector. Drainage events will be recorded in Appendix C.

2. Describe drainage control procedures from undiked storage areas, including operation of ponds, lagoons, or catchment basins where appropriate. Also, discuss methods of retaining and recovering a release.

   Same as above except that valves will be used to release clean water from impoundments.

3. Describe the procedure for supervising the drainage of rain water from secondary containment into a storm drain or an open water course. Discuss inspection methods, security methods and record maintenance. A record of inspection and drainage events should be maintained on the form included in Appendix C.

   Prior to discharge, visual observations and odor detection will be made by the inspector or supervisor. In the absence of a sheen or odors, valve will be opened to drain secondary containment. At completion of drainage event, valve will be closed and drainage event will be recorded in Appendix C.

DESIGN AND OPERATING INFORMATION

Bulk Storage Tanks (§112.7(e)(2))

1. Complete the table below for each above- and below-ground tank, sump, tank truck, oil-filled electrical equipment and drum at the facility.

TANK ID	TANK TYPE (i.e.,volume, horiz./vert. orientation, operating pressure)	MATERIAL OF CONSTRUCTION (i.e., welded steel, riveted steel, fiberglass, etc.)	FAIL-SAFE ENGINEERING FEATURES (include corrosion protection, lockout, high level alarms, secondary containment, etc.)	DESCRIBE SECONDARY CONTAINMENT (include material used in construction, capacity, draining methods)
TK-1 - Condensate/Water	16,800 gallons, vertical, fixed roof, atmospheric pressure	Welded steel		Earthen berm consisting of clayey soil and capable of holding at least 110 percent of the tank volume. Berm covered with gravel. Accumulated water removed by vacuum truck. As previously discussed, a minimum 10-mil thick HDPE liner or equivalent to be installed if or when a release occurs.
TK-2 - Condensate	16,800 gallons, verical, fixed roof, atmospheric pressure	Welded steel		Earthen berm consisting of clayey soil and capable of holding at least 110 percent of the tank volume. Berm covered with gravel. Accumulated water removed by vacuum truck. As previously discussed, a minimum 10-mil thick HDPE liner or equivalent to be installed if or when a release occurs.
TK-3 - Water	10,500 gallons, vertical, fixed roof, atmospheric pressure	Welded steel		Earthen berm consisting of clayey soil and capable of holding at least 110 percent of the tank volume. Berm covered with gravel. Accumulated water removed by vacuum truck. As previously discussed, a minimum 10-mil thick HDPE liner or equivalent to be installed if or when a release occurs.
~~TK-4~~ - Lube Oil TK 8902	1,000 gallons, horizontal, bullet, atmospheric pressure	Welded steel		None.
TK-5 - Diesel Fuel	300 gallons, horizontal, fixed roof, atmospheric pressure	Welded steel		Concrete dike capable of containing at least 110 percent of the tank volume. Accumulated water removed by evaporation or vacuum truck.
TK-6 - Gasoline	300 gallons, horizontal, fixed roof, atmospheric pressure	Welded steel		Concrete dike capable of containing at least 110 percent of the tank volume. Accumulated water removed by evaporation or vacuum truck.
TK-7 - Hydrocarbon Solvent	500 gallons, vertical, fixed roof, atmospheric pressure	Welded Steel		Concrete dike capable of containing at least 110 percent of the tank volume. Accumulated water removed by evaporation or vacuum truck.

DESIGN AND OPERATING INFORMATION

TANK ID	TANK TYPE (i.e.,volume, horiz./vert. orientation, operating pressure)	MATERIAL OF CONSTRUCTION (i.e., welded steel, riveted steel, fiberglass, etc.)	FAIL-SAFE ENGINEERING FEATURES (include corrosion protection, lockout, high level alarms, secondary containment, etc.)	DESCRIBE SECONDARY CONTAINMENT (include material used in construction, capacity, draining methods)
~~TK-9~~ - Waste Oil TK 8901	350 gallons, vertical, fixed roof, atmospheric pressure	Welded steel		Waste oil tank contained within galvanized steel stock tank capable of containing 110 percent of the tank volume. Accumulated water removed by evaporation or vacuum truck.
TK-10 - Propane	4,113 gallons, horizontal, bullet, 200 psig	Welded steel		None.
TK-11 - Diethanolamine	43,453 gallons, vertical, fixed roof, atmospheric pressure	Welded steel		None.
TK-14 - Methanol	1000 ~~750~~ gallons, horizontal, fixed roof, atmospheric pressure	Welded steel		Concrete dike capable of containing at least 110 percent of the tank volume. Accumulated water removed by evaporation or vacuum truck.
~~TK-15~~ - Glycol Surge TV500		Welded steel	Tank equipped with high level alarm to prevent overfill.	None.
T3 - T5 - Propane	42,000 gallons, horizontal, bullet, 200 psi, out of service	Welded steel		Not necessary since contents will volatilize.
T6 - T7 - Butane	42,000 gallons, horizontal, bullet, 200 psi, out of service	Welded steel		None. Tanks are out of service. In the event tanks are brought back into service, an HDPE-lined earthen berm will be constructed as shown on Figure 2 in Appendix F.
T9 - T12 Gasoline	42,000 gallons, horizontal, bullet, 200 psi, out of service	Welded steel		None. Tanks are out of service. In the event tanks are brought back into service, an HDPE-lined earthen berm will be constructed as shown on Figure 2 in Appendix F.
T13 - Gasoline	100,000 gallons, horizontal, bullet, 200 psi, out of service	Welded steel		None. Tank is out of service. In the event tanks are brought back into service, an HDPE-lined earthen berm will be constructed as shown on Figure 2 in Appendix F.
T-01 - Pigged Liquids	350 bbls, horizontal, bullet, 250 - 500 psig	Welded steel	Overfill/overflow designed to divert to process. Equipped with high level alarm shutdown.	None. Tank is elevated in order to visually inspect for leakage.
T-02 - Hydrocarbon Surge Tank	18,000 gallons, horizontal, bullet, at flare pressure	Welded steel		Tank is located within an HDPE-lined earthen berm that has adequate capacity to contain 110 percent of the tanks capacity. Earthen materials consist of clayey soils.

DESIGN AND OPERATING INFORMATION

TANK ID	TANK TYPE (i.e.,volume, horiz./vert. orientation, operating pressure)	MATERIAL OF CONSTRUCTION (i.e., welded steel, riveted steel, fiberglass, etc.)	FAIL-SAFE ENGINEERING FEATURES (include corrosion protection, lockout, high level alarms, secondary containment, etc.)	DESCRIBE SECONDARY CONTAINMENT (include material used in construction, capacity, draining methods)
T-03 - Water	120 bbls, vertical, fixed roof, atmospheric pressure	Welded steel	Removed Feb. 16, 2000	Tank is located in vicinity of catch pond. Releases from tank would enter catch pond and be contained.

2. Describe the procedures for tank inspections and record keeping.

   There are no formal tank inspection procedures. Visual observations are made on a periodic basis.

3. Are internal heating coils used in tanks? **No**

   If yes, describe how the system operates and how the heat medium volume is monitored, stored and disposed.

4. Describe the disposal facilities or methods for plant effluents discharged from the facility. Include a discussion of the observation and record keeping procedures.

   All effluent goes to tank TK-1. Oil is separated and sold with hydrocarbons. Water goes to evaporation pond. Glycol and amine waste water are sent to the evaporation pond.

Facility Transfer Operations, Pumping, and In-Plant Process (§112.7(e)(3))

1. Are buried pipelines wrapped and/or coated to reduce corrosion? **Yes**

2. Is cathodic protection used at the facility? **Yes**

3. When a buried pipeline section is exposed, is it inspected for corrosion and repaired as necessary? **Yes**

4. Are product transfer lines capped, plugged or blank-flanged when not in use or out of service for extended periods of time? **Yes**

   Describe procedures to prevent spills from product transfer lines.

   Catch basins/pans and plugs are used at product transfer locations.

5. Are pipe supports for all aboveground piping designed to minimize abrasion and allow for expansion and contraction? **Yes**

   If applicable, describe pipe support design.

   Pipe shoes are welded on pipe. Clamps and chains are also utilized to provide pipe movement.

6. Describe procedures for inspection of aboveground piping, valves, drip pans, catch basins, and other appurtenances. Also, discuss corrective action measures to be taken in the event of a leak or release.

All equipment and containment structures are routinely visually inspected for leakage. Immediate actions are taken to isolate the spill, shut off source and clean up spill.

7. Describe procedures and safety precautions for vehicular traffic in and around the facility to avoid damaging aboveground piping, valves, drip pans, catch basins, etc.

Visible guard posts are installed at the various tank loading facilities. Dikes and other containment structures provide a physical barrier between other tanks and valves.

Facility Tank Car and Tank Truck Loading/Unloading Rack (§112.7(e)(4))

1. Does tank car or tank truck loading/unloading occur at the facility? **Yes, truck loading.**

If no, skip the remainder of this section.

2. Do the loading/unloading procedures meet the minimum Department of Transportation requirements and regulations (see 49 CFR Parts 171, 173, 174, 177 and 179)? **Yes**

Describe deficiencies and/or comment on applicability.

3. Describe the loading/unloading facilities. Include discussion on spill prevention and spill control features. Specify the containment volume. (*Note: the containment volume should hold the maximum volume of any single compartment of a tank truck or tank car loaded/unloaded in the facility)*

Diversion dikes/berms are used where loading and unloading occurs to contain any releases that may occur. Capacity of diversion dikes/berms are adequate to contain potential release volumes. Diversion dikes/berms will be contructed for tanks T-3 through T-7 and T-9 through T-13 if these tanks are brought back into service.

4. Is there a warning light, physical barrier system or warning signs for vehicles to prevent incomplete disconnects?

   Warning signs are posted that instruct drivers on security procedures. No physical barriers or warning lights are used.

   If yes, describe the warning system and/or barrier system.

5. Is there an inspection program to ensure that valves and fittings on tank trucks and tank cars are not leaking prior to loading/unloading and departure?

   There is no formal inspection program. Valves and fittings are visually inspected by the drivers prior to loading/unloading and departure.

Onshore Oil Production Facilities (§112.7(e)(5))

1. Are field drainage ditches, road ditches, and oil traps, sumps or skimmers (if they exist) inspected at regularly scheduled intervals for accumulation of oil? **Yes**

   If no, explain why not.

   If yes, describe inspection procedures, intervals and methods employed to remove oil the may be released.

   Visual observations are made and in the event of a release, immediate actions would be taken to remediate the impact. Procedures are specified in Appendix G.

2. Describe the inspection procedures for above ground valves, pipelines and salt water disposal facilities (if applicable).

   Visual inspections are made as discussed in Appendix G.

3. Describe flowline maintenance program to prevent spills.

   Periodic pressure tests will be conducted and cathodic protection will be maintained.

4. For oil drilling and workover facilities:

   a. Was a blowout preventer assembly and well control system installed before

drilling below any casing string and as required during workover operations?

b. Is the blowout preventer assembly capable of controlling any expected wellhead pressure?

If no, describe why not and discuss preventative measures.

c. Do casing and blowout preventer assembly conform to state regulations?

If no, describe deficiencies.

Security (§112.7 (e)(9))

1. Is the facility, processing area, or area used to store oil fenced? **Yes**

2. Are the entrance gates locked or guarded when the facility is unattended?

Facility is always attended, therefore, gates are not closed and locked.

3. Is the facility equipped with lighting? **Yes**

4. Are the master flow and drain valves on tanks, piping and other equipment locked in the closed position when in non-operating or non-standby status? **Yes**

Spill History

Use the Spill History Form in Appendix D to annually update this SPCC Plan.

Spill Notification

In the event of a spill or release, the facility manager and environmental engineer shall be notified immediately. The facility manager and/or environmental engineer shall determine what, if any, agencies need to be contacted. The spill notification list is included in Appendix E.

The following information must be available when reporting a spill:

- Facility name;
- Legal description of location where spill or release occurred;
- Date and time of spill/release;
- Description and volume of material spilled or released;
- Direction of flow of spill/release and distance traveled;
- Identification of any waterways affected, including dry draws, and volume involved;
- Cause of spill/release;

- Actions taken to control and/or contain spill/release;
- Other pertinent information specific to the spill/release.

Facility Plot Plan and Topographic Map

An updated plot plan and topographic map are included in Appendix F. Modifications to the plot plan and topographic map shall be made in red ink and forwarded to the facility manager identified in the General Information section of this document.

APPENDIX A
SPILL HISTORY

Complete this form for any reportable spill(s) from this facility that occurred during the 12-months prior to January 10, 1974.

1. Date of Spill/Release:

   Cause of Spill/Release:

   Volume of Spill/Release:
   Corrective Action Taken/Plans for Preventing Recurrence:

2. Date of Spill/Release:

   Cause of Spill/Release:

   Volume of Spill/Release:

   Corrective Action Taken/Plans for Preventing Recurrence:

3. Date of Spill/Release:

   Cause of Spill/Release:

   Volume of Spill/Release:

   Corrective Action Taken/Plans for Preventing Recurrence:

APPENDIX B
WRITTEN COMMITMENT OF MANPOWER, EQUIPMENT AND MATERIALS FOR SPILL CONTROL (§112.7(d))

Secondary containment or diversion structures are impracticable at this facility for the following reasons:

Not applicable.

A strong oil spill contingency plan following the provisions of 40 CFR Part 109 is attached.

Not applicable.

A written commitment of manpower, equipment, and materials required to expeditiously control and remove any harmful quantity of oil discharged is attached.

Note: The commitment of manpower, equipment and materials must specify names, addresses and 24-hour phone numbers of individuals and companies that will be responsible for spill control.

APPENDIX C
DRAINAGE EVENT INSPECTION RECORD

Inspection Procedures:

1) Perform observation of all containment or diversion structures prior to drainage event immediately after each precipitation event in excess of ½-inch). Note depth of water, depth of product (if any), presence of sheen or presence of odors. Notify your regional environmental immediately if there is product or a sheen present.

2) At time of observation record any deviations from previous inspection report. The entry on the inspection report must be signed by the inspector.

3) When drainage is necessary, notify the facility supervisor. If product, oil sheen or odor is present, notify your regional environmental engineer immediately for additional instruction.

4) On the inspection record, note the start and end times of the release and the estimated volume of the release.

5) Have the drainage event signed by the facility supervisor or inspector.

6) Annually place a copy of the inspection report in the SPCC Plan.

The above procedures have been reviewed and approved by the undersigned.

Kent McEvers
Area Manager

Date 2/24/00

DRAINAGE INSPECTION REPORT FOR SAN JUAN PLANT

DATE	INSPECTION OR DRAINAGE EVENT?	DEPTH OF WATER (FEET)	DEPTH OF PRODUCT (FEET)	SHEEN PRESENT? (YES OR NO)	ODOR PRESENT? (YES OR NO)	START DATE & TIME OF DRAINAGE EVENT	END DATE & TIME OF DRAINAGE EVENT	ACTION TAKEN	SUPERVISOR'S OR INSPECTOR'S SIGNATURE

Copy Form as Necessary

APPENDIX D
CURRENT SPILL HISTORY

DATE	CAUSE OF RELEASE/SPILL	VOLUME RELEASED	CORRECTIVE ACTION

Copy Form as Needed.

APPENDIX E

SPILL NOTIFICATION LIST

Name	Title	Phone
Kent McEvers	Area Manager	(505) 598-5601 (office) (505) 860-7208 (mobile) (505) 326-4054 (home)
Robert McClain	OFM Operator	(505) 598-5601 (office) (505) 325-8715 (home)
Arlyn Thorson	Maintenance Supervisor	(505) 598-5601 (office) (505) 860-2156 (mobile) (505) 326-6718 (home)
Ron LePlatt	Environmental Engineer	(303) 252-6237 (office) (303) 252-6240 (fax)
Don Meadows	Safety Representative	(307) 638-9429 (office) (303) 941-2625 (mobile)
San Juan County Sheriff		(505) 334-6622
New Mexico State Patrol		(505) 325-7547
Kirtland Fire Department		(505) 334-6622
Ambulance		(505) 325-8631
National Response Center		(800) 424-8802
New Mexico Health & Environment Department		
Emergency Response Team		(505) 827-9329
Air Quality Division		(505) 984-0020
New Mexico Enegry and Minerals Department		
Oil Conservation Division - Santa Fe		(505) 827-5800
District III - Aztec		(505) 334-6178
New Mexico State Corporation Commission		(505) 827-4501
U.S. EPA Region VI		(214) 665-2222

WRONG #

COMMITMENT OF MANPOWER AND MATERIALS

Facility Name: San Juan Plant

Facility Location:

99 Road 6500 (Street Address or Physical Location)

Kirtland (City) San Juan (County)

New Mexico (State)

(505) 598-5601 (Phone)

Response Contractor:

Industrial Mechanical Inc. (Company Name)

P.O. Box 2408 / 3030 LaPlata Highway (Street Address)

Farmington (City) New Mexico (State)

(505) 325-5005 (Phone)

_____ (Alternate Phone)

Ben Hazlewood (Contact Name)

Response Materials at Facilities: (check all that apply)

✓ Shovels ✓ Squeeges

✓ Loose Absorbent (Qty. 200 lbs. or _____)

✓ Absorbent Snakes (Qty. 10) ✓ Absorbent Pads (Qty. 200)

✓ Overpack Drums (Qty. 4) ✓ Plastic Sheeting

✓ On-site Available Soil (Qty. unlimited) ____ Barricades

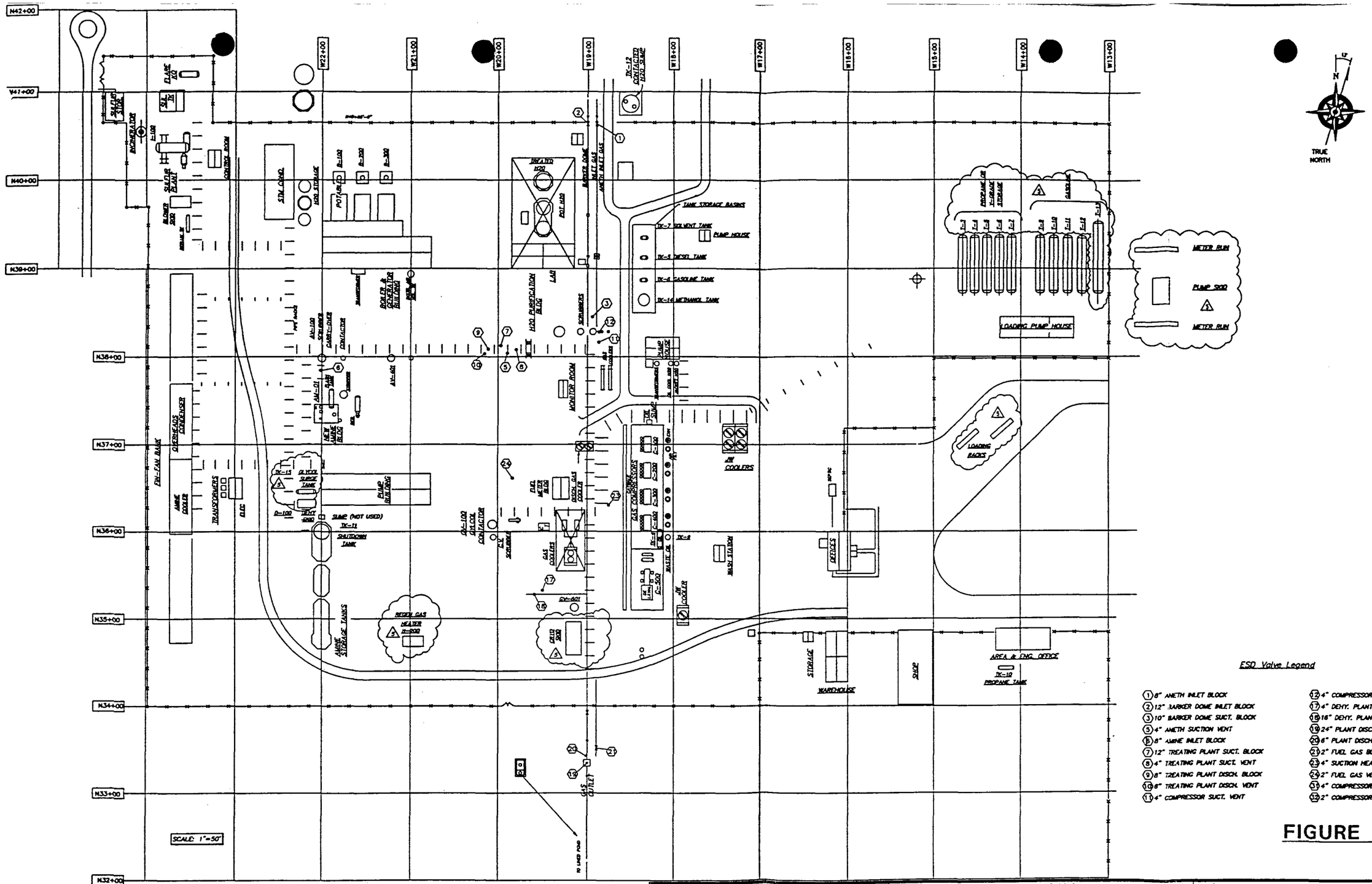
✓ Fire Extinguishers ✓ Personal Protective Wear

✓ Heavy Equipment (Specify Cat Dozer, Backhoe, Bobcat)

____ Other (Specify _____)

APPENDIX F

FACILITY PLOT PLAN AND TOPOGRAPHIC MAP



ESD Valve Legend

① 8" ANETH INLET BLOCK
② 12" BARKER DOME INLET BLOCK
③ 10" BARKER DOME SUCT. BLOCK
⑤ 4" ANETH SUCTION VENT
⑥ 8" AMINE INLET BLOCK
⑦ 12" TREATING PLANT SUCT. BLOCK
⑧ 4" TREATING PLANT SUCT. VENT
⑨ 8" TREATING PLANT DISCH. BLOCK
⑩ 6" TREATING PLANT DISCH. VENT
⑪ 4" COMPRESSOR SUCT. VENT
⑫ 4" COMPRESSOR DISCH. VENT
⑰ 4" DEHY. PLANT SUCT. VENT
⑱ 16" DEHY. PLANT SUCT. BLOCK
⑲ 24" PLANT DISCHARGE BLOCK
⑳ 6" PLANT DISCHARGE VENT
㉑ 2" FUEL GAS BLOCK
㉓ 4" SUCTION HEADER VENT
㉔ 2" FUEL GAS VENT
㉛ 4" COMPRESSOR GAS BLOCK
㉜ 2" COMPRESSOR GAS VENT

FIGURE 1A

OCATIONS OF NEW ADDITIONS TO BE FIELD VERIFIED.

REFERENCE DRAWINGS

DWG. NO.	TITLE

REVISIONS

NO.	DESCRIPTION	BY	DATE	CHK	DATE	APPR	DATE
5	ADDED AS-BUILTS (SEE NOTE 1)	LCA	10/20/00	DLJ	10/20/00	PM	10/20/00
4	REVISED PER KENTS MARK-UPS	CA	11/1/94				
3	REVISED PER FIELD	CA	2/14/94				
2	REVISED PER FIELD MARK-UPS	PE	5-19-94				
1	REVISED PER KENT'S MARK-UPS	AB	11-15-93	DJ			
0	FOR APPROVAL						

Western Gas Resources, Inc.
12200 N. Pecos St. - Denver Colorado 80234 - (303) 452-5603

SCALE 1"=50' | DRAWING CREATED ORDES 5/11/92 | EDIT DATE ORDES 2/2/00 | PLOT DATE 2/2/00

SAN JUAN RIVER PLANT PLOT PLAN

OIL & GAS SYSTEMS DESIGN CO.
CASPER, WYOMING

CAD FILE NAME SJPP0100

PROJ/DWG # SJPP0100 REV 5

FRUITLAND
KIRTLAND

WATERFLOW
YOUNGS LAKE

San Juan Gas Plant
Section 1, T29N, R15W
San Juan County, NM

APPENDIX G

SPCC PLAN INSPECTION PROCEDURES AND CHECKLIST

WESTERN GAS RESOURCES, INC.
SPCC PLAN INSPECTION PROCEDURES

The following inspection procedures shall be used by Western Gas Resources, Inc. personnel, its affiliates, contractors and subcontractors to ensure compliance with SPCC regulations. Inspections shall be conducted monthly unless otherwise specified and records of inspections shall be maintained for a period of 3 years. One exception is that inspections are required within 24 hours (or as soon as possible) of a precipitation event that produces ½-inch or more of precipitation. Inspection results shall be recorded on the attached form and submitted to the facility or system supervisor no later than the 15th day of the month following the inspection unless otherwise specified.

Kent McLane
Signature of Facility or System Manager/Supervisor

2/24/00
Date

WESTERN GAS RESOURCES, INC.
SPCC INSPECTION FORM

FACILITY NAME:	
INSPECTION PERIOD (MO/YR):	
DATE OF INSPECTION (MO/DAY/YR):	
INSPECTED BY:	

Are dikes/berms in good physical condition and capable of containing 110 percent of the capacity of the single largest tank? Specify what, if any, improvements are necessary.	____ Yes ____ No	
Inspect valves and fittings for leakage. Are any valves/fittings found to be leaking? If yes, specify what impacts have occurred to ground surface. Also specify repair schedule.	____ Yes ____ No	
Inspect catch basins, ponds, lagoons and diversion structures for integrity. Are facilities functioning as designed or intended? Comment on presence of oil and water in facilities and specify schedule for removal.	____ Yes ____ No ____ N/A	
Inspect tanks and other vessels for leakage. Are there any indications of leakage or overflow? Provide specifics on leakage or overflow and schedule for repair.	____ Yes ____ No	
Is cathodic protection in good condition and operating properly? If not, describe problems detected and provide schedule for repair.	____ Yes ____ No ____ N/A	
Inspect grounding stations/connections for integrity. Is grounding station(s) in good condition? Specify what, if any, repairs need to be made.	____ Yes ____ No ____ N/A	
Check high level alarms and liquid level sensors and gauges for proper operation. Are alarms and sensors functioning properly? Indicate any problems encountered.	____ Yes ____ No ____ N/A	
Inspect pipe supports. Is piping adequately supported? Specify any improvements to pipe supports that are necessary.	____ Yes ____ No ____ N/A	
Inspect drainage ways and ditches for the presence of hydrocarbon liquids, glycols, oils, etc. Are there any fluids other than water present in drainages and ditches or any discolored soils that may indicate previous impacts?	____ Yes ____ No	

Inspect warning signs, tank labels, and protective barriers. Are signs, labels and barriers in good physical condition and highly visible?	____ Yes ____ No	
Do transporters have up-to-date loading and unloading procedures that are being followed? Specify whose procedures are being used and where the procedures are located.	____ Yes ____ No	
If a workover or well installation is in progress, is adequate spill control involved? Specify what control measures are employed, what free-board is available in pits and how chemicals are stored.	____ Yes ____ No ____ N/A	
Is tank heating system functioning properly? If not, specify necessary repairs and provide schedule.	____ Yes ____ No ____ N/A	
Have there been any activities resulting in the exposure of buried piping? If yes, comment on the condition of the piping, pipe wrap, coating, etc.	____ Yes ____ No	
Is site fencing, gates and lighting in good condition? If not, specify repairs required and provide schedule.	____ Yes ____ No ____ N/A	
Have drainage event inspections been recorded on the reporting form in the SPCC plan? Compliance with SPCC regulations requires accurate record keeping.	____ Yes ____ No	

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

September 14, 1999

CERTIFIED MAIL
RETURN RECEIPT NO. Z 357 870 163

Mr. James E. Fleak, P.E.
Western Gas Resources, Inc.
12200 N. Pecos Street
Denver, Colorado 80234-3439

Dear Mr. Fleak:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of your minor modification to Discharge Plan GW-033. This information will be incorporated into Western Gas Resources, Inc. File.

If you require any further information or assistance please do not hesitate to write or call me at (505-827-7155).

Sincerely Yours,

Wayne Price-Pet. Engr. Spec.
Environmental Bureau

cc: Aztec District Office

Western Gas Resources, Inc.

June 24, 1999

New Mexico Oil Conservation Division
Attn: Mr. Wayne Price
2040 S. Pacheco
Santa Fe, NM 87505

RE: Followup to Include Additional Liquid Hydrocarbon Storage Tanks at Western Gas Resources, Inc.'s San Juan River Plant, San Juan County, NM
Reference GW-033 Plan

Dear Mr. Price:

Western Gas Resources, Inc. (Western Gas) has revised the site plot plan and process flow diagram including the added tanks discussed in our letter submitted to your office on April 14, 1999. As you indicated in our telephone conversation then, the addition of these four pressurized, above ground liquid storage tanks would likely be considered a minor modification to the GW-033 plan and would not require a plan review fee or public review. Western Gas has also enclosed a copy of the liner specifications for the inlet slug catcher tank bermed area. Please amend the GW-033 plan to include the operation of these four tanks and provide Western Gas a written response to this request. Contact me at (303)450-8420 if you have any questions or need further information.

Sincerely,

James E. Fleak

James E. Fleak, P.E.
Sr. Environmental Engineer

enclosures (3)
cc: K. McEvers/SJRP, B. Portz, E. Aabak, D. Anderson

C:/files/wtrprmt/sanjuan/gw33md1a.ltr

SECTION A - PHYSICAL PROPERTIES

PART A-1: MATERIAL SPECIFICATIONS

8130 XR-5®: Property	Test Method	Requirement
1. Thickness	ASTM D-751	30 mils minimum (8130) – 0.75mm minimum (8130) 40 mils nominal (8138) – 1.0mm nominal (8138)
2. Weight	ASTM D-751	30.0 ± 2 oz./sq. yd. (8130) – 1020 ± 70 g/m² (8130) 38.0 ± 2 oz./sq. yd. (8138) – 1290 ± 70 g/m² (8138)
3. Tear Strength	ASTM D-1117 Trap Tear	35 lbs./35 lbs. (min.) – 150 N/150 N (min.)
4. Breaking Yield Strength	ASTM D-751 Grab Tensile	550 lbs./550 lbs. (min.) – 2450 N/2450 N (min.)
5. Low Temperature	ASTM D-2136 4 hrs. – ⅛" mandrel	–30°F (–35°C) No cracking
6. Dimensional Stability (each direction)	ASTM D-1204 212°F. – 1 hr.	1% max.
7. Hydrostatic Resistance	ASTM D-751 Method A	800 psi (min.) – 540 N/cm² (min.)
8. Blocking Resistance 180°F.	ASTM D-751	#2 Rating max.
9. Adhesion – Ply. lbs./in. of width	ASTM D-413 2" per min.	15 lbs./in. (min.) – 25 N/cm (min.) or film tearing bond
10. Adhesion – heat sealed seam lbs./in. of width	ASTM D-751	35lbs./2" dielectric weld (min.) – 150 N/5 cm (min.)
11. Dead Load Seam shear strength	(Mil-T-52983 E Modified Para. 4.5.2.19 2" overlap seam, 4 hours)	Must withstand 210 lbs./in. @ 70°F – 900 N/in. @ 21°C 105 lbs./in. @ 160°F – 450 N/in. @ 70°C
12. Bonded Seam Strength	ASTM D-751, seam strength as modified by NSF 54	550 lbs. (min.) – 2450 N (min.)
13. Abrasion Resistance (Taber Method)	Method 5306 Fed. Std. 191a H-18 Wheel 1000 gm. load	2000 cycles (min.) before fabric exposure 50 mg./100 cycles max. wt. loss
14. Weathering Resistance	Carbon-Arc Atlas Weather-o-meter	8,000 hrs. (min.) No appreciable changes or stiffening or cracking of coating
15. Water Absorption	ASTM D-471, Section 12 7 Days	0.025 kg./m² max. @ 70°F 0.14 kg./m² max. @ 212°F
16. Wicking	Shelter-Rite procedure	⅛" (max.) – 0.3cm (max.)
17. Puncture Resistance	ASTM D-4833	250 lbs. (min.) – 1100 N (min.)
18. Bursting Strength	ASTM D-751 Ball Tip	650 lbs. (min.) – 2900 N (min.) 800 lbs. (typ.) – 3500 N (typ.)
19. Coefficient of Thermal Expansion/Contraction	ASTM D-696	8 X 10 -6 in/in °F (max.) – 1.8 X 10 -5 cm/cm °C (max.)

All Values As Produced

SECTION B — CHEMICAL/ENVIRONMENTAL RESISTANCE

PART B-1: XR-5® FLUID RESISTANCE GUIDELINES

The data below is the result of laboratory tests and is intended to serve only as a guide. No performance warranty is intended or implied. The degree of chemical attack on any material is governed by the conditions under which it is exposed. Exposure time, temperature, and size of the area of exposure usually varies considerably in application, therefore, this table is given and accepted at the user's risk. Confirmation of the validity and suitability in specific cases should be obtained.

When considering XR-5 for specific applications, it is suggested that a sample be tested in actual service before specification. Where impractical, tests should be devised which simulate actual service conditions as closely as possible.

EXPOSURE	RATING
AFFF	A
Acetic Acid (5%)	B
Acetic Acid (50%)	C
Ammonium Phosphate	T
Ammonium Sulfate	T
Antifreeze (ethylene glycol)	A
Animal Oil	A
Aqua Regia	X
ASTM Fuel A (100% Iso-octane)	A
ASTM Oil #2 (Flash pt. 240°C)	A
ASTM Oil #3	A
Benzene	X
Calcium Chloride Solutions	T
Calcium Hydroxide	T
20% Chlorine Solution	A
Clorox	A
Conc. Ammonium Hydroxide	A
Corn Oil	A
Crude Oil	A
Diesel Fuel	A
Ethanol	A
Ethyl Acetate	C
Ethyl Alcohol	A
Fertilizer Solution	A
#2 Fuel Oil	A
#6 Fuel Oil	A
Furfural	X
Gasoline	B
Glycerin	A
Hydraulic Fluid – Petroleum Based	A
Hydraulic Fluid – Phosphate Ester Based	C
Hydrocarbon Type II (40% Aromatic)	C
Hydrochloric Acid (50%)	A
Hydrofluoric Acid (5%)	A
Hydrofluoric Acid 50%)	A
Hydrofluosilicic Acid (30%)	A
Isoprophyl Alcohol	T
Ivory Soap	A
Jet A	A

EXPOSURE	RATING
JP-4 Jet Fuel	A
JP-5 Jet Fuel	A
JP-8 Jet Fuel	A
Kerosene	A
Magnesium Chloride	T
Magnesium Hydroxide	T
Methanol	A
Methyl Alcohol	A
Methyl Ethyl Ketone	X
Mineral Spirits	A
Naphtha	A
Nitric Acid (5%)	B
Nitric Acid (50%)	C
Perchloroethylene	C
Phenol	X
Phenol Formaldehyde	B
Phosophoric Acid (50%)	A
Phosophoric Acid (100%)	C
Phthalate Plasticizer	C
Potassium Chloride	T
Potassium Sulphate	T
Raw Linseed Oil	A
SAE-30 Oil	A
Salt Water (25%)	B
Sea Water	A
Sodium Acetate Solutions	T
Sodium Bisulfite Solution	T
Sodium Hydroxide (60%)	A
Sodium Phosphate	T
Sulphuric Acid (50%)	A
50% Tanic Acid	A
Toluene	C
Transformer Oil	A
Turpentine	A
Urea Formaldehyde	A
UAN	A
Vegetable Oil	A
Water (200°F)	A
Xylene	X
Zinc Chloride	T

Ratings are based on visual and physical examination of samples after removal from the test chemical after the samples of Black XR-5 were immersed for 28 days at room temperature. Results represent ability of material to retain its performance properties when in contact with the indicated chemical.

RATING KEY:

A—Fluid has little or no effect
B—Fluid has minor to moderate effect
C—Fuild has severe effect
T—No data-likely to be acceptable
X—No data-not likely to be acceptable

ENVIRONMENTAL LINERS, INC.
Corporate Headquarters
2009 N. Industrial Road
Cortez, Colorado 81321
1-800-821-0531

PA Office (610) 326-3068 Fax (610)326-3047
GA Office (404)873-1944 Fax (404)873-1967
x Cortez Office (970) 565-9540 Fax (970)565-8844

Quotation Proposal

Date: 04/09/99 Page 1 of 1

Project Title:

Owner or Agency:

WESTERN GAS RESOURCES
P.O. BOX 70
KRITLAND, NM

ATTN: MR. JEFF JENKINS
(505)598-5601

Location (Ship to Address):

Quotation Number:	Plans By:	Bid Date:	FOB Point:	Estimated Ship Date:
Spec. Number:		04/09/99	CORTEZ, CO FULL FREIGHT TO SITE CUSTOMER UNLOADING	1 WEEK ARO & APPROVED SUBMITTALS

Bid Item Number	Quantity	Unit	Description	Unit Price	Total
			FURNISH & INSTALL		
	2,599	SF	XR-5 8130	L.S.	$4,295.00

PRICE INCLUDES: ALL NECESSARY, NON-UNION, NON-PREVAILING WAGE LABOR AND EQUIPMENT REQUIRED TO COMPLETELY INSTALL THE LINER ON YOUR FULLY PREPARED, DRY AND MAINTAINED SURFACE. BOOTS WITH ATTACHMENT, TEN (10) YEAR PRORATED MATERIAL WARRANTY AND ONE (1) YEAR INSTALLATION WARRANTY.

PRICE EXCLUDES: SUBGRADE PREPARATION OR MAINTENANCE, DIGGING, BACKFILLING OR COMPACTION OF ANCHOR TRENCHES, SOIL STERILIZATION, DEWATERING OF GROUND OR RAIN WATER, FILLING OR LEAKAGE TESTING OF PONDS AND UNLOADING OF MATERIALS. SALES TAX, BONDS, FEES OR PERMITS.

NOTES:
- PRICE QUOTED IS BASED ON ONE (1) MOVE-IN WITH AMBIENT TEMPERATURES EXCEEDING 50° F.
- A COLD WEATHER SURCHARGE WILL BE ADDED IF INSTALLATION IS NECESSARY BELOW 50° F.
- CONTRACTOR TO PROVIDE FRONT-END LOADER W/FORKS AND OPERATOR DURING LINER INSTALLATION TO ASSIST WITH PANEL PLACEMENT.
- ELI IS A SMALL BUSINESS CONCERN.

Prices are firm for 30 days from quotation

Acceptance: This Quotation-Proposal can only be accepted upon execution of this Quotation-Proposal by seller. This Proposal shall constitute a binding contract between Seller and Buyer, upon execution of this Proposal by Seller and transmittal of such Proposal by United States Mail or other delivery service to Buyer. The date of acceptance of this Quotation-Proposal shall be the date Seller executes this Quotation-Proposal and the place of acceptance shall be Cortez, Colorado.

Environmental Liners, Inc.

MILES STURDEVANT
SENIOR ESTIMATOR

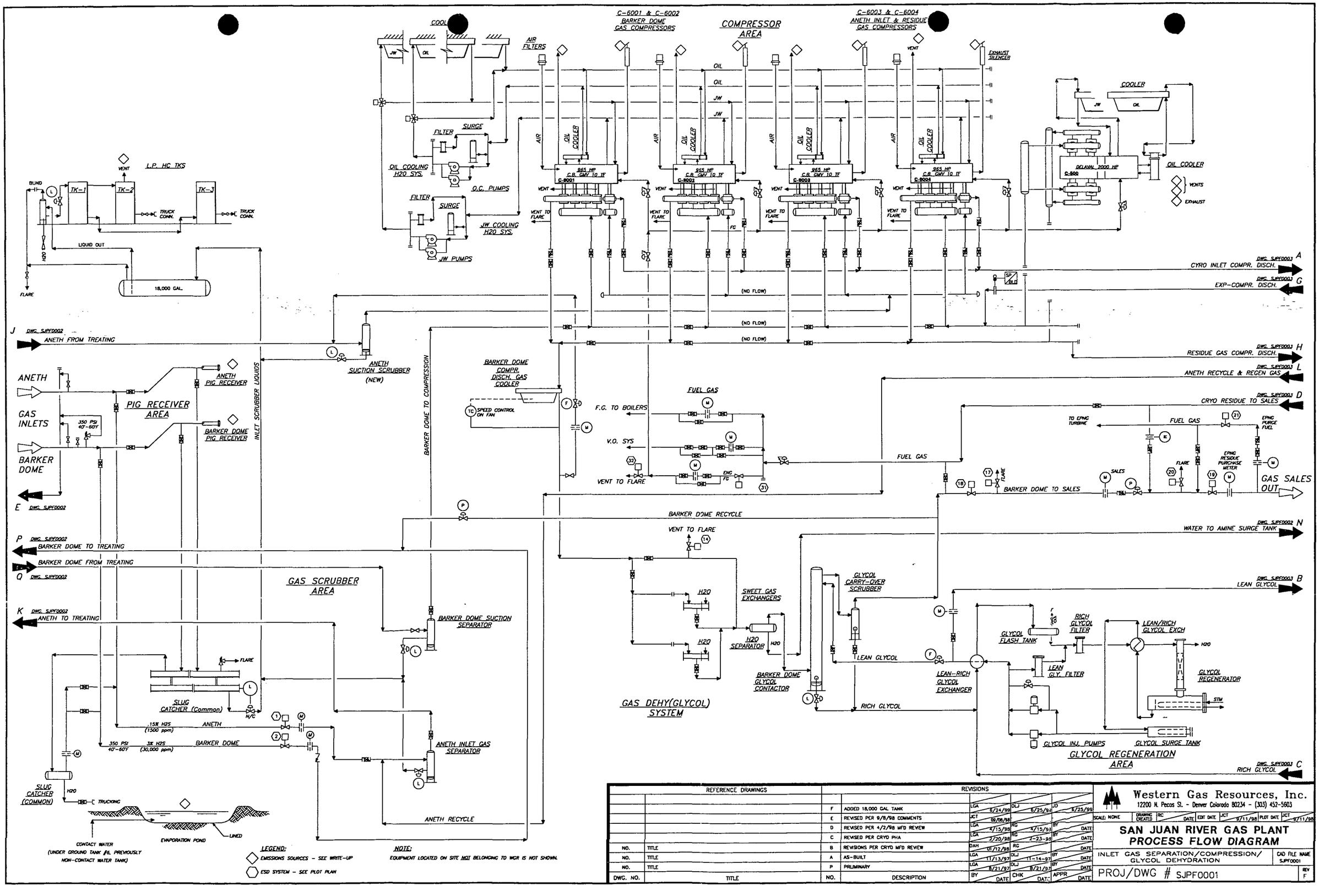
Signature of Buyer constitutes an offer to accept this proposal, all the terms and conditions of sales of this Proposal and any special conditions attached hereto and on the reverse side hereof. Upon Seller's acceptance of this Order, Buyer agrees to be bound thereby, contingent upon award of project where applicable. Buyer acknowledges that he has read the terms and conditions of sale on reverse side.

The undersigned agrees to and acknowledges that all charges are due within 30 days after receipt of invoice. A finance charge of 21% per annum will be charged on past due accounts, together with all costs of collection, with or without suit, including court costs and reasonable attorney fees.

(Company Name-Please Print)

(Buyer's Signature) Date

(Buyer's Name & Title-Please Print)



REFERENCE DRAWINGS		REVISIONS					
				LGA 6/24/99	DLJ 6/25/99	JD 6/25/99
		F	ADDED 18,000 GAL TANK			
		E	REVISED PER 9/8/98 COMMENTS	JCT 09/08/98	RG	BY DATE
		D	REVISED PER 4/2/98 WFD REVIEW	LGA 4/15/98	RG 4/15/98	BY DATE
		C	REVISED PER CRYO PHA	LGA 2/20/98	RG 2-23-98	BY DATE
NO. TITLE		B	REVISIONS PER CRYO WFD REVIEW	DAH 01/12/98	RG	BY DATE
NO. TITLE		A	AS-BUILT	LGA 11/13/97	DLJ 11-14-97	BY DATE
NO. TITLE		P	PRLIMINARY	LGA 8/21/97	DLJ 8/21/97	BY DATE
DWG. NO.	TITLE	NO.	DESCRIPTION	BY DATE	CHK DATE	APPR DATE

Western Gas Resources, Inc.
12200 N. Pecos St. - Denver Colorado 80234 - (303) 452-5603

SCALE: NONE | DRAWING CREATED RC DATE | EDIT DATE JCT 9/11/98 | PLOT DATE JCT 9/11/98

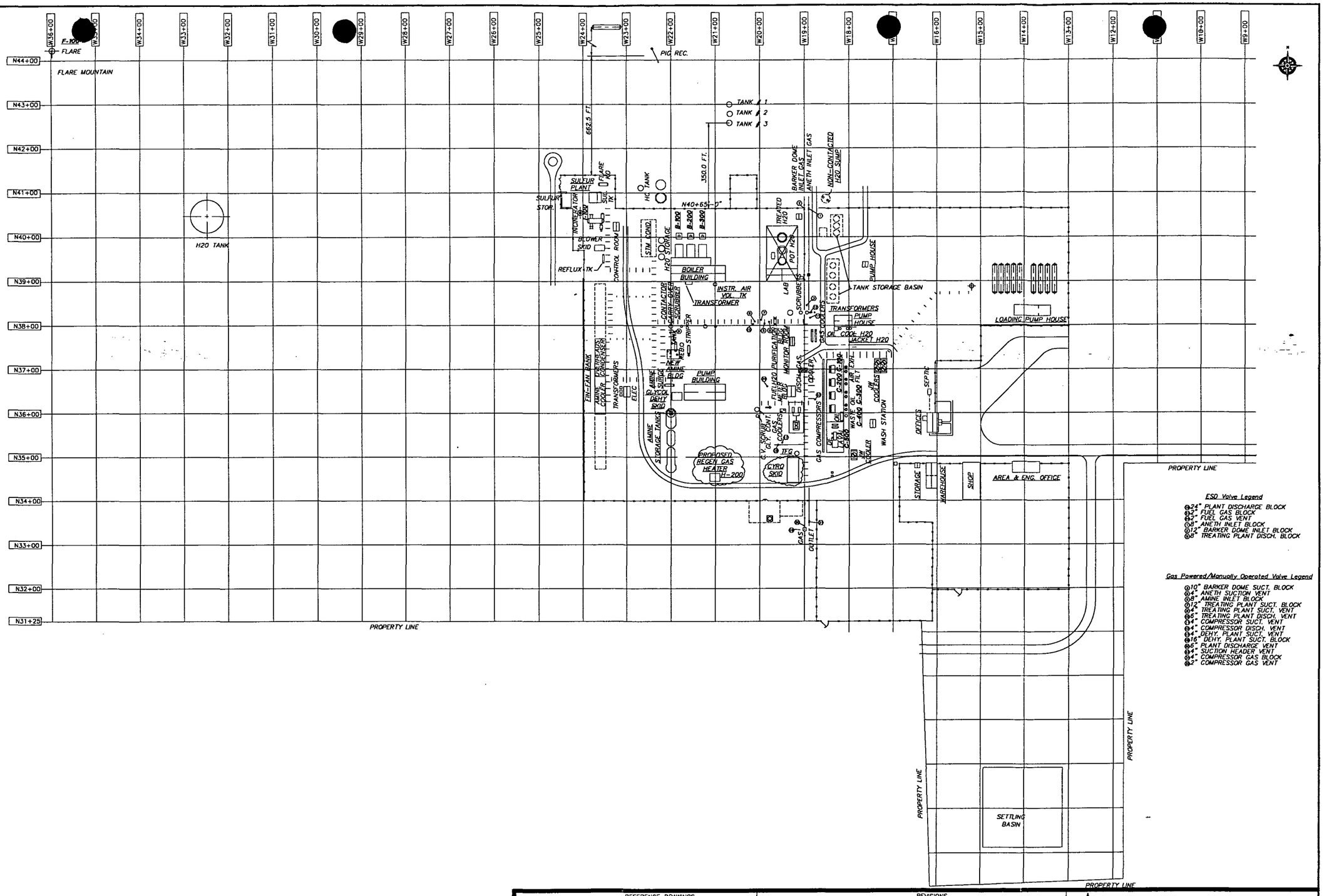
SAN JUAN RIVER GAS PLANT
PROCESS FLOW DIAGRAM

INLET GAS SEPARATION/COMPRESSION/ GLYCOL DEHYDRATION

CAD FILE NAME SJPF0001

PROJ/DWG # SJPF0001

REV F



ESD Valve Legend

- 24" PLANT DISCHARGE BLOCK
- 2" FUEL GAS BLOCK
- 2" FUEL GAS VENT
- 6" ANETH INLET BLOCK
- 12" BARKER DOME INLET BLOCK
- 8" TREATING PLANT DISCH. BLOCK

Gas Powered/Manually Operated Valve Legend

- 10" BARKER DOME SUCT. BLOCK
- 4" ANETH SUCTION VENT
- 8" AMINE INLET BLOCK
- 12" TREATING PLANT SUCT. BLOCK
- 4" TREATING PLANT SUCT. VENT
- 6" TREATING PLANT DISCH. VENT
- 4" COMPRESSOR SUCT. VENT
- 4" COMPRESSOR DISCH. VENT
- 4" DEHY. PLANT SUCT. VENT
- 16" DEHY. PLANT SUCT. BLOCK
- 6" PLANT DISCHARGE VENT
- 4" SUCTION HEADER VENT
- 4" COMPRESSOR GAS BLOCK
- 2" COMPRESSOR GAS VENT

REFERENCE DRAWINGS

DWG. NO.	TITLE

NO.	DESCRIPTION	BY / DATE	CHK / DATE	APPR / DATE
6	ADDED 18,000 GAL LIQUID STORAGE TANK	LCA 6/24/99	DLJ 6/25/99	JD 6/25/99
5	ADDED NEW CRYO SKID & TEG CONTACTOR	DAH 08/15/97	DLJ	
4	REVISED PER KENT'S MARK-UPS	CA 11/1/94		
3	REVISED PER FIELD	CA 2/14/94		
2	REVISED PER FIELD MARK-UPS	JPE 6-19-94		
1	REVISED PER KENT'S MARK-UPS	AB 11-15-93	DJ	
0	FOR APPROVAL			

Western Gas Resources, Inc.
12200 N. Pecos St. - Denver Colorado 80234 - (303) 452-5603

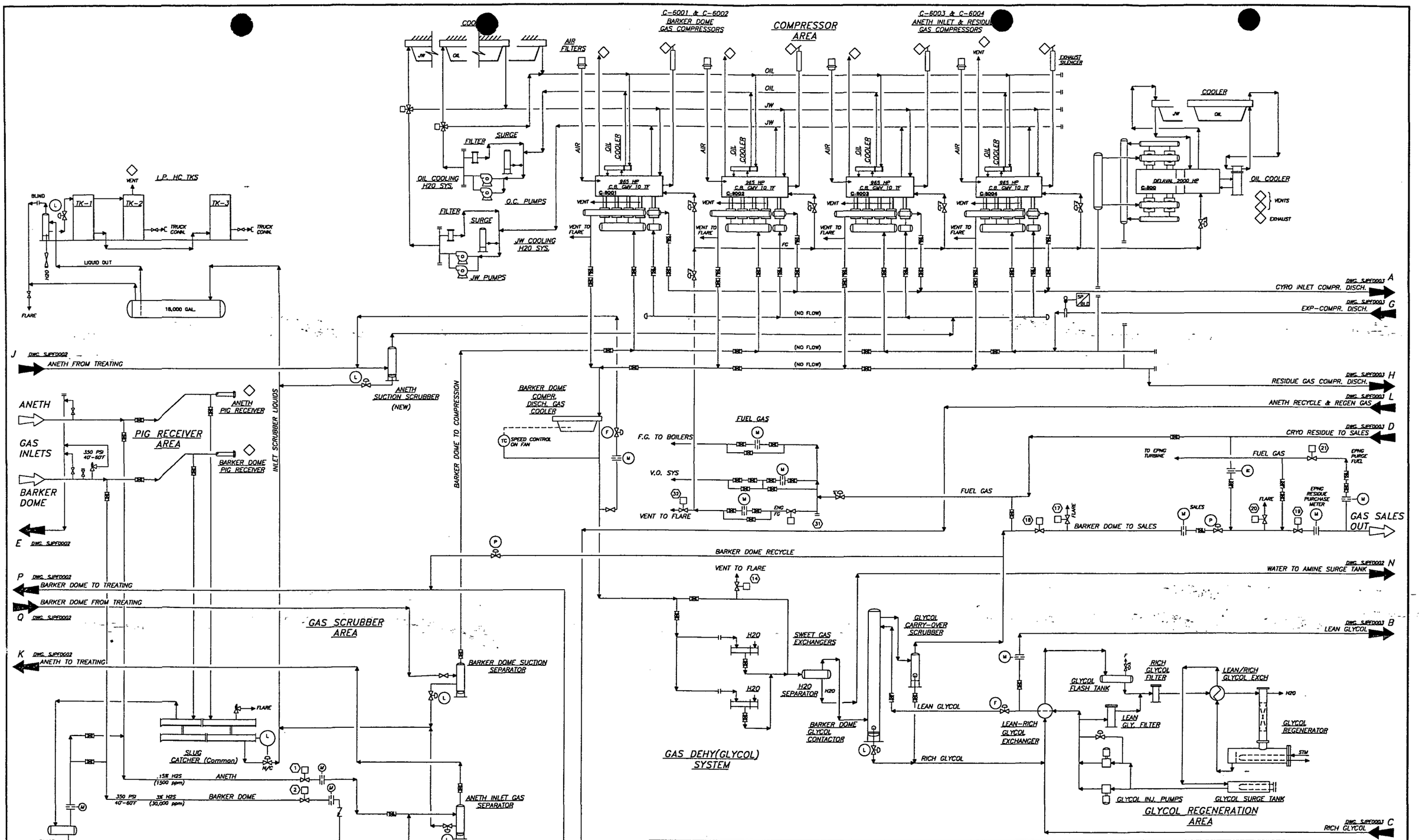
SCALE: 1"=100' | DRAWING CREATED: ORDES 5/11/92 | EDIT DATE: LCA 6/24/99 | PLOT DATE: 6/24/99

SAN JUAN RIVER PLANT
PLOT PLAN

OIL & GAS SYSTEMS DESIGN CO.
CASPER, WYOMING

CAD FILE NAME: SJPP0100

PROJ/DWG # SJPP0100 REV 4



REFERENCE DRAWINGS		REVISIONS						
		F	ADDED 18,000 GAL TANK	LGA 5/24/99	DLJ 5/25/99	JD 5/25/99		
		E	REVISED PER 9/8/98 COMMENTS	JCT 09/08/98	RC	BY DATE		
		D	REVISED PER 4/2/98 MFD REVIEW	LGA 4/15/98	RC 4/15/98	BY DATE		
		C	REVISED PER CRYO PHA	LGA 1/20/98	RC 2-23-98	BY DATE		
NO.	TITLE	B	REVISIONS PER CRYO MFD REVIEW	DAH 01/12/98	RC	DATE		
NO.	TITLE	A	AS-BUILT	LGA 11/13/97	DLJ 11-14-97	BY DATE		
NO.	TITLE	P	PRLIMINARY	LGA 8/21/97	DLJ 8/21/97	BY DATE		
DWG. NO.	TITLE	NO.	DESCRIPTION	BY DATE	CHK DATE	APPR DATE		

Western Gas Resources, Inc.
12200 N. Pecos St. - Denver Colorado 80234 - (303) 452-5603

SCALE: NONE | DRAWING CREATED: RC DATE | EDIT DATE: JCT 9/11/98 | PLOT DATE: JCT 9/11/98

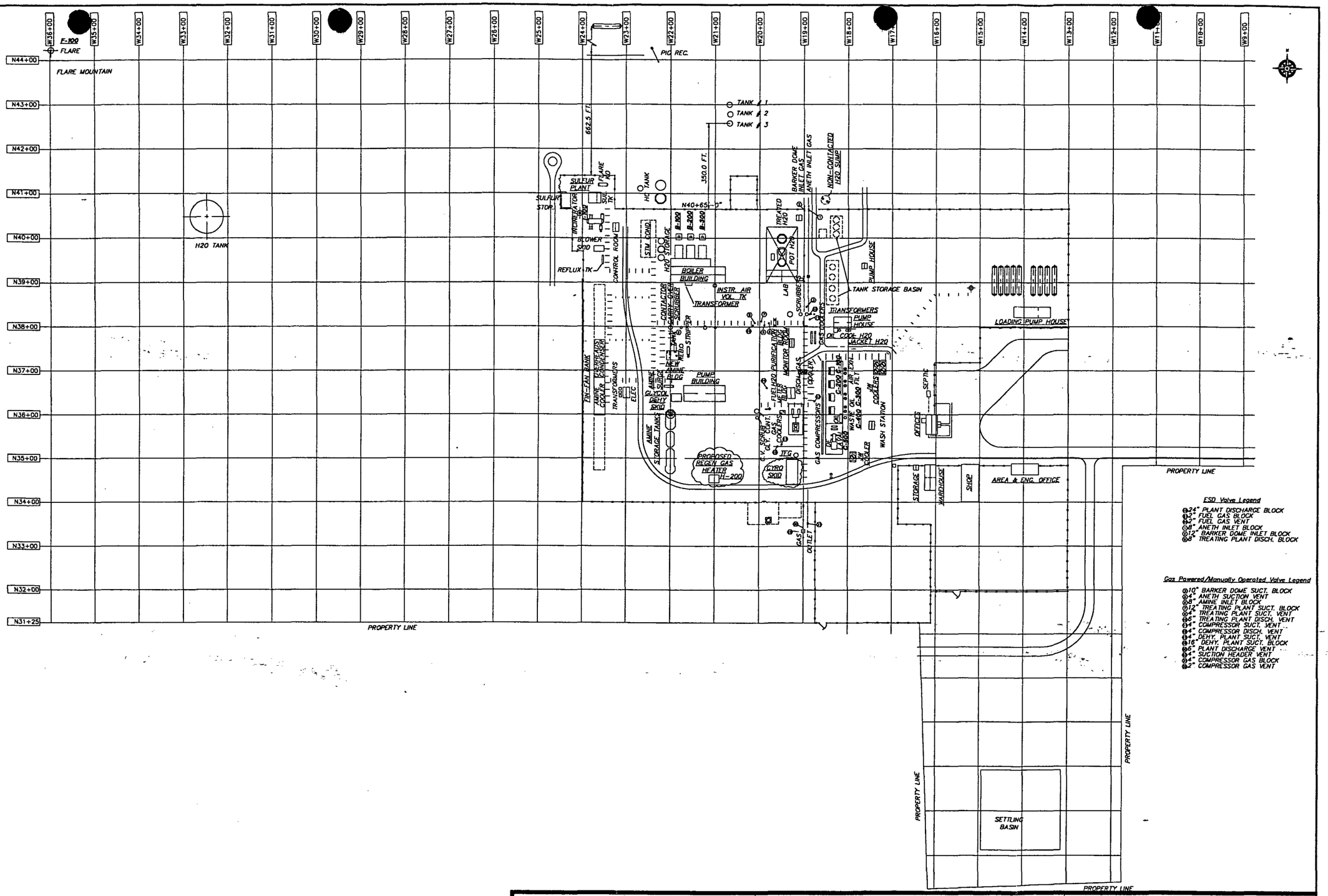
SAN JUAN RIVER GAS PLANT
PROCESS FLOW DIAGRAM

INLET GAS SEPARATION/COMPRESSION/ GLYCOL DEHYDRATION

CAD FILE NAME: SJPF0001

PROJ/DWG # SJPF0001

REV F



ESD Valve Legend

- ⊗24" PLANT DISCHARGE BLOCK
- ⊗12" FUEL GAS BLOCK
- ⊗12" FUEL GAS VENT
- ⊗8" ANETH INLET BLOCK
- ⊗12" BARKER DOME INLET BLOCK
- ⊗8" TREATING PLANT DISCH. BLOCK

Gas Powered/Manually Operated Valve Legend

- ⊗10" BARKER DOME SUCT. BLOCK
- ⊗4" ANETH SUCTION VENT
- ⊗8" AMINE INLET BLOCK
- ⊗12" TREATING PLANT SUCT. BLOCK
- ⊗4" TREATING PLANT SUCT. VENT
- ⊗6" TREATING PLANT DISCH. VENT
- ⊗14" COMPRESSOR SUCT. VENT
- ⊗4" COMPRESSOR DISCH. VENT
- ⊗4" DEHY. PLANT SUCT. VENT
- ⊗16" DEHY. PLANT SUCT. BLOCK
- ⊗6" PLANT DISCHARGE VENT
- ⊗4" SUCTION HEADER VENT
- ⊗14" COMPRESSOR GAS BLOCK
- ⊗2" COMPRESSOR GAS VENT

REFERENCE DRAWINGS

DWG. NO.	TITLE

NO.	DESCRIPTION	BY	DATE	CHK	DATE	APPR	DATE
6	ADDED 18,000 GAL LIQUID STORAGE TANK	LGA	6/24/99	DLJ	6/25/99	JD	6/25/99
5	ADDED NEW CRYO SKID & TEG CONTACTOR	DAH	08/15/97	DLJ			
4	REVISED PER KENT'S MARK-UPS	CA	11/1/94				
3	REVISED PER FIELD	CA	2/14/94				
2	REVISED PER FIELD MARK-UPS	PE	6-19-94				
1	REVISED PER KENT'S MARK-UPS	AB	11-15-93	DJ			
0	FOR APPROVAL						

REVISIONS

Western Gas Resources, Inc.
12200 N. Pecos St. - Denver Colorado 80234 - (303) 452-5603

SCALE: 1"=100' | DRAWING CREATED: ORDES 5/11/92 | EDIT DATE: LGA 6/24/99 | PLOT DATE: 6/24/99

SAN JUAN RIVER PLANT
PLOT PLAN

OIL & GAS SYSTEMS DESIGN CO.
CASPER, WYOMING

CAD FILE NAME: SJPP0100

PROJ/DWG # SJPP0100 | REV 4

NEW MEXICO ENERGY, MINERALS & NATURAL RESOURCES DEPARTMENT

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

November 24, 1998

CERTIFIED MAIL
RETURN RECEIPT NO. Z-357-870-040

Mr. James E. Fleak, P.E.
Western Gas Resources, Inc.
12200 North Pecos Street
Denver, Colorado 80234-3439

RE: Site Modifications Notification
GW-033, San Juan River Gas Plant
San Juan County, New Mexico

Dear Mr. Fleak:

The OCD has received the site modification letter, dated November 18, 1998, from Western Gas Resources, Inc. for the San Juan River Gas Plant GW-033 located in Section 1, Township 29 North, Range 15 West, NMPM, San Juan County, New Mexico. The collection and storage of solid non-spec sulfur at the San Juan River Gas Plant until transport to the Waste Management Landfill facility is **hereby approved. The site modifications are approved without modification to the discharge plan.**

Please note that Section 3104 of the regualtions requires that **"When a plan has been approved, discharges must be consistent with the terms and conditions of the plan."** Pursuant to Section 3107.C Western Gas Resources, Inc. is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the dischaarge of water quality or volume. Further, this approval does not relieve Western Gas Resources, Inc. from liability should operations result in contamination to the environment.

Sincerely,

W. Jack Ford, R.P.G.
Environmental Bureau
Oil Conservation Division

cc: Mr. Denny Foust - Aztec District Office

Z 357 870 040

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

Sent to	James Fleak
Street & Number	West Gas
Post Office, State, & ZIP Code	Denver
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date	GW-033

PS Form **3800**, April 1995

NOV 23

Western Gas Resources, Inc.

November 18, 1998

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

RE: Request to Include Additional Waste Stream for the Discharge Monitoring Plan GW-33
Western Gas Resources, Inc.'s San Juan River Plant, San Juan County, NM

Dear Mr. Anderson:

Western Gas Resources, Inc. (Western Gas) wishes to include an additional waste stream in the San Juan River Plant's Discharge Monitoring Plan (GW-33). Western Gas conferred with Ms. Martyne Kieling of your office several months ago to discuss the proper method of notifying your office of the additional waste stream. The additional waste stream is only produced during maintenance activities. The waste is characterized as off-spec sulfur and is considered nonhazardous, since it consists mainly of solid sulfur recovered by the sulfur recovery unit (SRU) at the plant. The off-spec sulfur is contaminated with soil or rocks.

Molten sulfur recovered by the SRU occasionally crystallizes and forms a solid around the edges of the molten sulfur pit or around process piping in the area of the SRU, which occasionally falls to the ground during maintenance activities. This solid sulfur material is then collected and gathered in a small separate waste container. The solid sulfur can be contaminated with some quantity of soil or rock at the ground surface creating the off-spec sulfur as a waste. The solid sulfur contaminated with soil or rock is considered off-spec and therefore cannot be shipped offsite with the molten sulfur that is hauled offsite by a sulfur shipper. The volume and frequency of disposal of the off-spec sulfur is approximately 1-2 tons annually. The off-spec sulfur is to be disposed of at the Waste Management Landfill in Farmington, NM. Please contact me at your earliest convenience if there are any questions at (303)450-8420.

Sincerely,

James E. Fleak

James E. Fleak, P.E.
Sr. Environmental Engineer
cc: K. McEvers/SJRP, L. Hinman, E. Aabak, D. Keanini, D. Anderson

C:/files/wtrpmt/sanjuan/addwaste.ltr

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 1/15/97,

or cash received on _____ in the amount of $ 1667.50

from Western Gas Resources

for San Juan G.P. GW-033
(Facility Name) (OCP No.)

Submitted by: _____ Date: _____

Submitted to ASD by: D Chavez Date: 1/24/97

Received in ASD by: _____ Date: _____

Filing Fee ___ New Facility ___ Renewal X

Modification ___ Other _____
(specify)

Organization Code 521.07 Applicable FY 97

To be deposited in the Water Quality Management Fund.

Full Payment X or Annual Increment ___

Western Gas Resources, Inc.
12200 N. Pecos Street
Denver, Colorado 80234
Telephone: (303) 452-5603

NationsBank of Georgia, N.A.
Atlanta, Dekalb County, Georgia

Check No. [redacted]

DATE 15-JAN-97

PAY THE SUM OF

One Thousand Six Hundred Sixty-Seven Dollars And 50 Cents

TO THE ORDER OF

AMOUNT *** 1,667.50

NEW MEXICO OIL CONSERVATION DIVISION 16451
2040 S PACHECO
SANTA FE, NM 87505

VOID IF NOT CASHED WITHIN NINETY DAYS

L F Outlaw

[redacted]

Western Gas Resources, Inc.
12200 N. Pecos Street
Denver, Colorado 80234
Telephone:(303) 452-5603

15-JAN-97 [redacted] 16451 NEW MEXICO OIL CONSERVATI[redacted] DIVISION CHECK# [redacted]

Invoice No.	Inv. Date	Description	Gross	Discount	Net Amt.
17-DEC-96	17-DEC-96		1,667.50	0.00	1,667.50

GW-033 San Juan Plant

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone ☐ Personal	Time 2:45 PM	Date 1-7-97

Originating Party	Other Parties
Pat Sanchez - OCD	James Fleak - Western Gas

Subject: Flat Fee's for GW-033 Renewal.
(The letter from Western Gas dated 1-2-97 did not mention paying the Flat Fee.)

Discussion: Mr. Fleak said that the check in the amount of $1,667.50 would be sent separately. Probably should receive in a week or so, they are going to pay the Full amount.

Conclusions or Agreements: Mr. Fleak will check on the Flat Fee and make sure that the check is cut.

Distribution: File.

Signed: Patricia M. Sanchez

Western Gas Resources, Inc.

April 14, 1999

New Mexico Oil Conservation Division
Attn: Mr. Wayne Price
2040 S. Pacheco
Santa Fe, NM 87505

RE: Request to Include Additional Liquid Hydrocarbon Storage Tanks at Western Gas Resources, Inc.'s San Juan River Plant, San Juan County, NM
Reference GW-033 Plan

Dear Mr. Price:

Western Gas Resources, Inc. (Western Gas) proposes to include four additional above ground, hydrocarbon liquid storage tanks in the GW-033 Discharge Monitoring Plan. The four tanks would only be considered to be potential leak sources and not as direct discharge points. Three of the four tanks involve the existing 40,000 gallon "bullet" type tanks located on the northeast side of the plant that have been empty. The 40,000 gallon bullet tanks will be used on occasion to store y-grade hydrocarbon liquids at pressures ranging from 150 - 250 psig. The fourth tank involves the addition of a new 17,000 gallon horizontal tank for the storage of inlet pipeline pigging liquids to be located at the northwest side of the site near the pig receiver.

The existing 40,000 gallon bullet tanks were originally built by El Paso Natural Gas Company (EPNG) to store natural gas liquids when the facility was started up and operated by EPNG. The 3-40,000 gallon bullet tanks rest upon concrete saddle type foundations and the ground below the tanks is not lined or bermed. Western Gas has not required the use of these tanks, ever since Western Gas purchased the site in 1989 from EPNG. Western Gas has operated the San Juan River facility only as a natural gas sweetening plant until the recent permitted modification. During September 1998, Western Gas began operating a 24 mmscf/day natural gas liquids unit in order to process gas gathered by the Aneth gas pipeline. The processed gas liquids are usually pumped through a gas liquids pipeline directly offsite. Occasionally, the processed gas liquids (y-grade) will be collected and stored in the 40,000 gallon bullet tanks. Since the y-grade product is considered to be a gas at standard ambient conditions, the GW-033 plan does not require a liner or berm to be installed for the pre-existing 40,000 gallon tanks. The dimensions of each tank are 120 inches diameter by 65 feet long, seam to seam. The y-grade product typically has a vapor pressure of approximately 220 psia at 60 degrees F. Until the new liquids transportation pipeline connection was completed, the y-grade product had been collected and stored in the 40,000 gallon tanks for brief periods.

12200 N. Pecos Street • Denver, Colorado 80234-3439 • (303) 452-5603

The new pigging liquids tank will be used to receive and store liquids brought to the plant inlet via periodic pipeline pigging activities. Typical hydrocarbons contained in the pigging liquids could include butanes or heavier constituents. The dimensions of the pigging liquids tank are to be 7 feet 6 inches diameter by 44 feet 6 inches long, seam to seam. The pigging liquids tank is rated for 148 psig, but will likely operate in the range of 15 psig initially. Western Gas intends to line the ground underneath the pigging liquids tank and berm the tank area to help prevent potential leaks of any heavy hydrocarbon liquids from reaching the ground water. The liner will be 30 mil thick and will be constructed of a material which is compatible for containing hydrocarbon liquids.

As you indicated in our telephone conversation last week, the addition of these four pressurized, above ground liquid storage tanks would likely be considered a minor modification to the GW-033 plan and would not require a plan review fee or public review. Western Gas will revise the San Juan River Plant's plot plan to indicate the locations of these four tanks and forward a copy as soon as the drawing can be redrafted. Please amend the GW-033 plan to include the operation of these four tanks and provide Western Gas a written response to this request. Contact me at your earliest convenience at (303)450-8420 if there are any questions or need for further information.

Sincerely,

James E. Fleak

James E. Fleak, P.E.
Sr. Environmental Engineer

cc: K. McEvers/SJRP, B. Portz, E. Aabak, D. Anderson

C:/files/wtrprmt/sanjuan/addwaste.ltr

Western Gas Resources, Inc.

December 11, 1996

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

Via Facsimile at (505)827-8177

RE: Submittal of Certification of Lab Waste Process Knowledge in Determining Waste Classification for Revision No. 1 of the Discharge Monitoring Plan GW-33
San Juan River Plant Located in San Juan County, New Mexico

Dear Mr. Sanchez:

Western Gas Resources, Inc. (Western Gas) hereby submits a certification that it has reviewed the inventory list of laboratory chemicals located at the San Juan River Plant's laboratory, in making the determination of the lab waste classification shown in the revised Discharge Monitoring Plan. This certification was requested by you by phone on Wednesday, December 11, 1996 in order for Western Gas to gain final approval of the Rev. 1 Discharge Plan. The lab waste was determined by Western Gas to be non-exempt from RCRA Subtitle C, but was also classified as a non-hazardous waste on the basis of the laboratory analyses performed. The possible lab waste constituents were also compared with the hazardous wastes listed in the RCRA regulations under 40CFR261.30 Subpart D. The target list of anayltes was determined from Western Gas' review of the inventory list of laboratory chemicals and their constituents, as they are stored or used in the lab tests. I have enclosed a copy of the laboratory chemical inventory list for the San Juan River Plant, which I used to review and determine the toxicity target analyte barium, specifically.

If you have any questions or concerns, please call me at (303)450-8420.

Sincerely,

James E. Fleak

James E. Fleak, P.E.
Sr. Environmental Engineer

Inter·Mountain
Laboratories, Inc.

2506 West Main Street
Farmington, New Mexico 87401
Tel. (505) 326-4737

James Fleak
Western Gas Resources, Inc.
12200 N. Pecos Street
Denver, Co. 80234

26 November 1996

Mr. Fleak:

Enclosed please find the reports for the sample received by our laboratory for analysis on November 19, 1996.

If you have any questions about the results of these analyses, please don't hesitate to call me at your convenience.

Sincerely,

Sharon Williams
Organic Analyst Supervisor

Enclosures

xc: Kent McEvers
File

Inter-Mountain Laboratories, Inc

2506 W. Main Street
Farmington, New Mexico 87401

Client:	Western Gas Resources		
Project:	Kirtland, NM	Date Reported:	11/26/96
Sample ID:	Lab Waste	Date Sampled:	11/19/96
Laboratory ID:	0396G02513	Date Received:	11/19/96
Sample Matrix:	Liquid		
Condition:	Intact		

Analyte	Result	Units
Ignitability	>140	° F
Corrosivity (pH)	8.82	
Barium	<0.01	ppm
Reactive Cyanide	<0.010	ppm
Reactive Sulfide	<0.01	ppm

Reg. Level = 100 ppm

RECEIVED

DEC 16 1996

Environmental Bureau
Oil Conservation Division

ND - Analyte not detected at stated detection level.

References:

Analysis performed according to SW-846 "Test Methods for Evaluating Liquid/Solid Waste: Physical/Chemical Methods" United States Environmental Protection Agency 3rd Edition, final Update II, September, 1994.

ASTM Annual Book of Standards

Reported by: SW

Reviewed by: BB

Inter-Mountain Laboratories, Inc.

2506 W. Main Street
Farmington, New Mexico 87401

Quality Control / Quality Assurance

Known Analysis / Method Blank Analysis / Spike Analysis

TOTAL METALS

Client:	Western Gas Resources	Date Reported:	11/26/96
Project:	Kirtland	Date Analyzed:	11/25/96
Sample Matrix:	Liquid	Date Received:	11/19/96

Parameter	Found Result	Known Result	Units	Percent Recovery	Acceptance Limits
Barium	0.98	1.00	mg/L	98%	90-110%

Method Blank Analysis

Parameter	Result	Detection Limit	Units
Barium	ND	0.01	mg/L

Spike Analysis

Parameter	Spike Result (mg/L)	Sample Result (mg/L)	Spike Added (mg/L)	Percent Recovery	Acceptance Limits
Barium	0.55	<0.01	1.00	***55%**	85-115%

Reference: Analysis performed according to SW-846 "Test Methods for Evaluating Solid Waste: Physical / Chemical Methods" United States Environmental Protection Agency 3rd Edition, Final Update II, September, 1994.

ASTM Annual Book of Standards

Comments: *Spike did not recover due to matrix interference such as sulfate.

Reported by _____ Reviewed by _____

Inter·Mountain Laboratories, Inc.

2506 W. Main Street
Farmington, New Mexico 87401

Quality Control / Quality Assurance

Known Analysis
FLASH POINT

Client:	Western Gas Resources	Date Reported:	11/26/96
Project:	Kirtland	Date Analyzed:	11/22/96
Sample Matrix:	Liquid	Date Received:	11/19/96

Parameter	Found Result	Known Result
p-Xylene	76°F	77°F

RECEIVED
DEC 16 1996
Environmental Bureau
Oil Conservation Division

Reference: Analysis performed according to SW-846 "Test Methods for Evaluating Solid Waste: Physical / Chemical Methods" United States Environmental Protection Agency 3rd Edition, Final Update II, September, 1994.

ASTM Annual Book of Standards

Comments:

Reported by _____

Reviewed by _____

James Fleck

INVENTORY
LABORATORY CHEMICALS

DESCRIPTION	QUANTITY ON HAND
Barium Chloride	
Buffer Solution, A.P.H.A. (Hardness)	
Buffer Solution, A.S.T.M. (Hardness)	
X ~~Buffer, Ref. Standard pH 7.00~~	
X ~~Buffer, Ref. Standard pH 10.00~~	
EDTA Titrant 1 ml = 1 mg. CaCO3	
Hydrochloric Acid, 50% (v/v)	
Hydrochloric Acid, 0.020 Normal (N/50)	
X ~~Hydrochloric Acid, 5.00 Normal~~	
Iodine, .0200N .0250N	
X ~~Iodine, .0300N~~	
X ~~Iodine, .0100N~~	
X ~~Iodine, .3300N~~	
X ~~Iodine, .0344N~~	
X ~~Iodine, .1300N~~	
Methyl Purple Indicator	
Molybdate Reagent	
Phenolphthalein, 0.5% in 50% Alcohol	
Potassium Hydroxide, 50% (w/v)	
Potassium Iodate-Iodide 1 ml = 0.5 mg.	
Sodium Thiosulfate, 0.010 Normal	
Starch Indicator 1% (w/v) Aqueous	
Water Hardness Indicator	
Taylor-Stannous Chloride	
Stopcock Lubricant	
Gas Absorption Pipette	
Liqui-Nox	
Burette Solution	
Mallinkrodt Sulfamic Acid	
Thermo-Vitex (Thyodene)	
Colorphast PH Strips	
Mallinkrodt Chem-Solv	
Sulfuric Acid .100 Normal (N/10)	
Chemetrics Titrets	

RECEIVED
DEC 16 1996
Environmental Bureau
Oil Conservation Division

X - Do not use any more, but on hand.

DATE _____

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To James Fleck	From Don Clifton
Co.	Co. San Juan
Dept.	Phone #
Fax #	Fax #

WGR

Fax Transmission

NM OCD 5058278177

TO: Pat Sanchez DATE: 12/12/96

FROM: James Fleak

SUBJECT: Lab Waste Analyses, Inventory of Lab Chemicals, & Cover Letter Certifying Classification of Lab Waste

TOTAL NUMBER OF PAGES (Including Cover Letter): 7

If you do not receive all the pages, please call as soon as possible:

NAME: PHONE: (303) 452-5603

FAX: (303) 450-6960

REMARKS: Hard Copy to follow in mail

WESTERN GAS RESOURCES, INC., 12200 N. PECOS STREET, DENVER, CO 80234 (303) 452-5603

Western Gas Resources, Inc.

December 11, 1996

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

Via Facsimile at (505)827-8177

RE: Submittal of Certification of Lab Waste Process Knowledge in Determining Waste Classification for Revision No. 1 of the Discharge Monitoring Plan GW-33
San Juan River Plant Located in San Juan County, New Mexico

Dear Mr. Sanchez:

Western Gas Resources, Inc. (Western Gas) hereby submits a certification that it has reviewed the inventory list of laboratory chemicals located at the San Juan River Plant's laboratory, in making the determination of the lab waste classification shown in the revised Discharge Monitoring Plan. This certification was requested by you by phone on Wednesday, December 11, 1996 in order for Western Gas to gain final approval of the Rev. 1 Discharge Plan. The lab waste was determined by Western Gas to be non-exempt from RCRA Subtitle C, but was also classified as a non-hazardous waste on the basis of the laboratory analyses performed. The possible lab waste constituents were also compared with the hazardous wastes listed in the RCRA regulations under 40CFR261.30 Subpart D. The target list of anayltes was determined from Western Gas' review of the inventory list of laboratory chemicals and their constituents, as they are stored or used in the lab tests. I have enclosed a copy of the laboratory chemical inventory list for the San Juan River Plant, which I used to review and determine the toxicity target analyte barium, specifically.

If you have any questions or concerns, please call me at (303)450-8420.

Sincerely,

James E. Fleak

James E. Fleak, P.E.
Sr. Environmental Engineer

Inter-Mountain
Laboratories, Inc.

2506 West Main Street
Farmington, New Mexico 87401
Tel. (505) 326-4737

James Fleak
Western Gas Resources, Inc.
12200 N. Pecos Street
Denver, Co. 80234

26 November 1996

Mr. Fleak:

Enclosed please find the reports for the sample received by our laboratory for analysis on November 19, 1996.

If you have any questions about the results of these analyses, please don't hesitate to call me at your convenience.

Sincerely,

Sharon Williams
Organic Analyst Supervisor

Enclosures

xc: Kent McEvers
File

Inter-Mountain Laboratories, Inc.

2508 W. Main Street
Farmington, New Mexico 87401

Client:	Western Gas Resources		
Project:	Kirtland, NM	Date Reported:	11/26/96
Sample ID:	Lab Waste 7	Date Sampled:	11/19/96
Laboratory ID:	0396G02513	Date Received:	11/19/96
Sample Matrix:	Liquid		
Condition:	Intact		

Analyte	Result	Units
Ignitability	>140	° F
Corrosivity (pH)	8.82	
Barium	<0.01	ppm
Reactive Cyanide	<0.010	ppm
Reactive Sulfide	<0.01	ppm

Reg. Level = 100 ppm

ND - Analyte not detected at stated detection level.

References:

Analysis performed according to SW-846 "Test Methods for Evaluating Liquid/Solid Waste: Physical/Chemical Methods" United States Environmental Protection Agency 3rd Edition, final Update II, September, 1994.

ASTM Annual Book of Standards

Reported by: SW

Reviewed by: JB

Inter-Mountain Laboratories, Inc.

2508 W. Main Street
Farmington, New Mexico 87401

Quality Control / Quality Assurance

Known Analysis / Method Blank Analysis / Spike Analysis

TOTAL METALS

Client:	Western Gas Resources	Date Reported:	11/26/96
Project:	Kirtland	Date Analyzed:	11/25/96
Sample Matrix:	Liquid	Date Received:	11/19/96

Parameter	Found Result	Known Result	Units	Percent Recovery	Acceptance Limits
Barium	0.98	1.00	mg/L	98%	90-110%

Method Blank Analysis

Parameter	Result	Detection Limit	Units
Barium	ND	0.01	mg/L

Spike Analysis

Parameter	Spike Result (mg/L)	Sample Result (mg/L)	Spike Added (mg/L)	Percent Recovery	Acceptance Limits
Barium	0.55	<0.01	1.00	*55%	85-115%

Reference: Analysis performed according to SW-846 "Test Methods for Evaluating Solid Waste: Physical / Chemical Methods" United States Environmental Protection Agency 3rd Edition, Final Update II, September, 1994.

ASTM Annual Book of Standards

Comments: *Spike did not recover due to matrix interference such as sulfate.

Reported by _____

Reviewed by _____

Inter-Mountain Laboratories, Inc.

2506 W. Main Street
Farmington, New Mexico 87401

Quality Control / Quality Assurance

Known Analysis
FLASH POINT

Client:	Western Gas Resources	Date Reported:	11/26/96
Project:	Kirtland	Date Analyzed:	11/22/96
Sample Matrix:	Liquid	Date Received:	11/19/96

Parameter	Found Result	Known Result
p-Xylene	76°F	77°F

Reference: Analysis performed according to SW-846 "Test Methods for Evaluating Solid Waste: Physical / Chemical Methods" United States Environmental Protection Agency 3rd Edition, Final Update II, September, 1994.

ASTM Annual Book of Standards

Comments:

Reported by _____

Reviewed by _____

James Fleak

INVENTORY
LABORATORY CHEMICALS

DESCRIPTION	QUANTITY ON HAND
Barium Chloride	
Buffer Solution, A.P.H.A. (Hardness)	
Buffer Solution, A.S.T.M. (Hardness)	
~~Buffer, Ref. Standard pH 7.00~~	
X ~~Buffer, Ref. Standard pH 10.00~~	
EDTA Titrant 1 ml = 1 mg. CaCO3	
Hydrochloric Acid, 50% (v/v)	
Hydrochloric Acid, 0.020 Normal (N/50)	
X ~~Hydrochloric Acid, 5.00 Normal~~	
Iodine, .0200N .0250N	
X ~~Iodine, .0300N~~	
X ~~Iodine, .0100N~~	
X ~~Iodine, .3300N~~	
X ~~Iodine, .0344N~~	
X ~~Iodine, .1500N~~	
Methyl Purple Indicator	
Molybdate Reagent	
Phenolphthalein, 0.5% in 50% Alcohol	
Potassium Hydroxide, 50% (w/v)	
Potassium Iodate-Iodide 1 ml = 0.5 mg.	
Sodium Thiosulfate, 0.010 Normal	
Starch Indicator 1% (w/v) Aqueous	
Water Hardness Indicator	
Taylor-Stannous Chloride	
Stopcock Lubricant	
Gas Absorption Pipette	
Liqui-Nox	
Burette Solution	
Mallinkrodt Sulfamic Acid	
Thermo-Vitex (Thyodene)	
Colorphast PH Strips	
Mallinkrodt Chem-Solv	
Sulfuric Acid .100 Normal (N/10)	
Chemetrics Titrets	

X - Do not use any more, but on hand

DATE _____

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To James Fleak	From Don Clifton
Co.	Co. San Juan
Dept.	Phone #
Fax #	Fax #

Western Gas Resources, Inc.

December 9, 1996

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

RE: Submittal of Revision No. 1 of the Discharge Monitoring Plan GW-33
for Western Gas Resources, Inc. San Juan River Plant
San Juan County, New Mexico

Dear Mr. Sanchez:

Western Gas Resources, Inc. (Western Gas) hereby submits two copies of the revised Discharge Monitoring Plan for the San Juan River Plant located in Kirtland, New Mexico. The revised Discharge Monitoring Plan is labeled Rev. 1 and is dated December 1996. The initial Discharge Plan was sent to you November 6, 1996 with the permit renewal application form. This Rev. 1 Discharge Plan was prepared in response to your comments concerning the exempt or non-exempt RCRA classification of the various wastes listed in the initial Discharge Plan.

Please replace the initial Discharge Plan with this Rev. 1 edition for final approval of the discharge permit renewal. If you have any questions or concerns, please call me at (303)450-8420.

Sincerely,

James E. Fleak, P.E.
Sr. Environmental Engineer

c: L. Hinman, K. McEvers, D. Keanini, E. Aabak, T. Marques, S. Doven, file
NM OCD-Aztec District Office

C:\files\wtrprmt\sanjuan\rev1cvr.ltr

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 10/31/96,

or cash received on _____ in the amount of $ 50.00

from Western Gas Resources

for San Juan River G.P GW-073

(Facility Name) (OP No.)

Submitted by: _____ Date: _____

Submitted to ASD by: [signature] Date: 12/11/96

Received in ASD by: _____ Date: _____

Filing Fee X/2 New Facility ___ Renewal ___

Modification ___ Other _____

(specify)

Organization Code 521.07 Applicable FY 97

To be deposited in the Water Quality Management Fund.

Full Payment ___ or Annual Increment ___

Western Gas Resources, Inc.
12200 N. Pecos Street
Denver, Colorado 80234
Telephone: (303) 452-5603

NationsBank of Georgia, N.A.
Atlanta, Dekalb County, Georgia

Check No. [redacted]

DATE 31-OCT-96

PAY THE SUM OF
Fifty Dollars And 00 Cents

TO THE ORDER OF

AMOUNT *** 50.00

NEW MEXICO ENVIRONMENTAL DEPARTMENT 7782
WATER QUALITY MANAGEMENT FUND
2040 S PACHECO
SANTA FE, NM 87505

VOID IF NOT CASHED WITHIN NINETY DAYS

[signature]

[redacted]

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

NEW MEXICO OIL CONSERVATION
ATTN:SALLY MARTINEZ
2040 S. PACHECO ST.
SANTA FE, NM 87505

AD NUMBER:578341 ACCOUNT:56689
LEGAL NO: 60737 P.O. #:96199002997

341 LINES once at $ 136.40
Affidavits: 5.25
Tax: 8.85
Total: $ 150.50

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, BETSY PERNER being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN,a daily news paper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication # 60737 a copy of which is hereto attached was published in said newspaper once each week for one consecutive week(s) and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 13th day of NOVEMBER 1996 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/ Betsy Perner
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 13th day of NOVEMBER A.D., 1996

OFFICIAL SEAL
Candace C. Ruiz
NOTARY PUBLIC - STATE OF NEW MEXICO
My Commission Expires: 9/29/99

Candace C. Ruiz

202 East Marcy Street • P.O. Box 2048 • Santa Fe, New Mexico 87501
505-983-3303 • (FAX)505-984-1785

AFFIDAVIT OF PUBLICATION

No. 37134

STATE OF NEW MEXICO
County of San Juan:

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

Friday, November 15, 1996;

and the cost of publication is: $115.68.

Robert Lovett

On 11/15/96 ROBERT LOVETT appeared before me, whom I know personally to be the person who signed the above document.

Denise H. Henson

My Commission Expires May 17, 2000

COPY OF PUBLICATION

Legals

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 renewal application and discharge plan 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-033) - Western Gas Resources, Inc., Mr. James Fleak, (303)-452-5603, 12200 N. Pecos Street, Denver, CO, 80234-3439, has submitted a Discharge Plan Renewal Application for their "San Juan River" Gas Plant located in Section 1, Township 29 North, Range 15 West, NMPM, San Juan County, New Mexico. Plant process waste water is discharged to a double lined surface evaporation pond, designed with a primary liner leak detection system. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 10 feet with a total dissolved solids concentration of approximately 4,500 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-271) - Williams Field Services, Ms. Leigh Gooding, (801)-584-6543, 295 Chipeta Way, Salt Lake City, UT, 84158, has submitted a Discharge Plan Application for their "Kernaghan" compressor station located in the SW/4 NW/4, Section 29, Township 31 North, Range 8 West NMPM, San Juan County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 570 feet with a total dissolved solids concentration of approximately 2000 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-272) - Williams Field Service, Ms. Leigh Gooding, (801)-584-6543, 295 Chipeta Way, Salt Lake City, UT, 84158, has submitted a Discharge Plan Application for their "Kernaghan B-8" compressor station located in the SE/4 SW/4 of Section 33, Township 31 North, Range 8 West, NMPM, San Juan County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 410 feet with a total dissolved solids concentration of approximately 2000 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-273) - Williams Field Services, Ms. Leigh Gooding, (801)-584-6543, 295 Chipeta Way, Salt Lake City, UT, 84158, has submitted a Discharge Plan Application for their "Moore" compressor station located in the NE/4 SW/4, Section 9, Township 30 North, Range 8 West, NMPM, San Juan County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 210 feet with a total dissolved solids concentration of approximately 2000 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-274) - Williams Field Services, Ms. Leigh Gooding, (801)-584-6543, 295 Chipeta Way, Salt Lake City, UT, 84158, has submitted a Discharge Plan Application for their "Pritchard Straddle" compressor station located in the SW/4 SW/4, Section 1, Township 30 North, Range 9 West, NMPM, San Juan County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 40 feet with a total dissolved solids concentration of approximately 2000 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 applications 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 the information in the discharge plan renewal applications 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 November 1996.

SEAL

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
/s/William J. LeMay
WILLIAM J. LEMAY, Director
WJL/pws

Legal No. 37134 published in The Daily Times, Farmington, New Mexico on Friday, November 15, 1996.

NOTICE OF PUBLICATION

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 8th day of November 1996.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
WILLIAM J. LEMAY,
Director
Legal #60737
Pub. November 13, 1996