

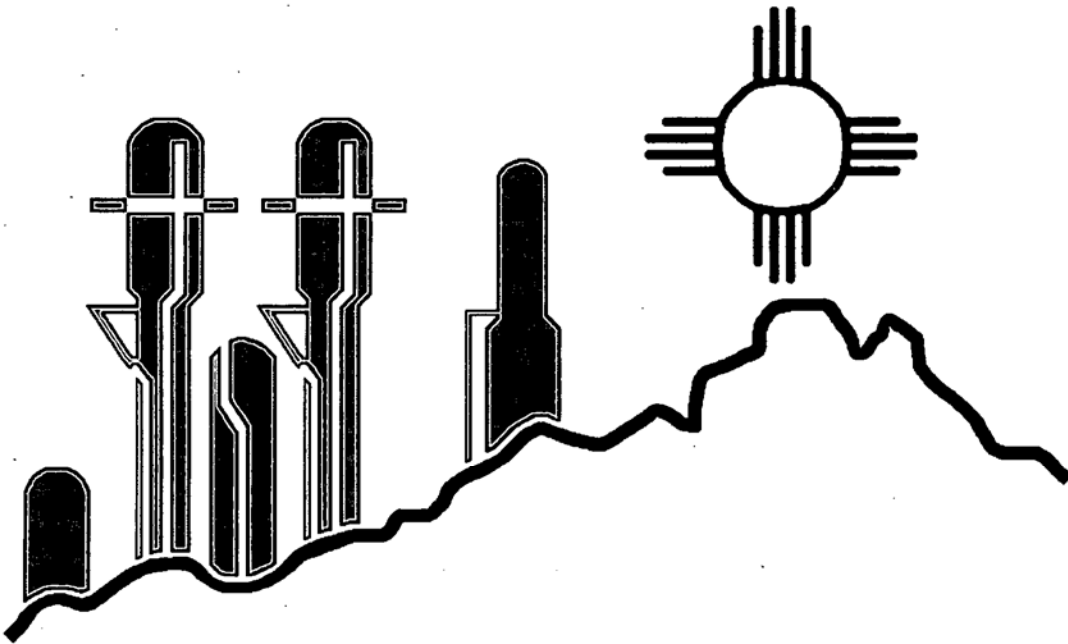
GW - 35

**PERMITS,
RENEWALS,
& MODS**

San Juan Basin Gas Plant

Discharge Plan

GW-035




ConocoPhillips

This Discharge Plan will expire on October 27, 2011

Lowe, Leonard, EMNRD

From: Lowe, Leonard, EMNRD
Sent: Wednesday, June 22, 2011 11:15 AM
To: 'Cox, Beverly J.'
Cc: Powell, Brandon, EMNRD; VonGonten, Glenn, EMNRD; Perrin, Charlie, EMNRD; Sanchez, Daniel J., EMNRD
Subject: Discharge Plan Process
Importance: High

Beverly Cox,

Good morning.

The NMOCD Santa Fe has received your discharge plan permit renewal application for the San Juan Basin Gas Plant, GW-035 along with its \$100 filing fee.

The NMOCD is verifying changes to its discharge plan permit categories. Please read the notification letter below, on the link.

<http://www.emnrd.state.nm.us/ocd/documents/20115-10DischargePlanannouncementFINAL.pdf>

The questionnaire is here:

<http://www.emnrd.state.nm.us/ocd/documents/20115-13DischargePermitQuestionnaire.pdf>

Please submit a questionnaire for each of your Discharge plan permitted facility through the OCD and submit to the Santa Fe NMOCD office. Either an electronic (e-mail) or hardcopy (mail) will suffice.

The NMOCD Santa Fe office will not receive the \$100 renewal fee until the questionnaire for GW-035 has been submitted.

Thank you for your attention.

llowe

Leonard Lowe

Environmental Engineer
Oil Conservation Division/EMNRD
1220 S. St. Francis Drive
Santa Fe, N.M. 87505
Office: 505-476-3492
Fax: 505-476-3462
E-mail: leonard.lowe@state.nm.us
Website: <http://www.emnrd.state.nm.us/ocd/>



Beverly J. Cox
Gas Activities
Gathering & Processing
PO Box 2197
Houston, TX 77252
505-486-2887

Certified Mail # 7008 1830 0001 4065 8551

June 16, 2011

State of New Mexico
Energy Minerals and Natural Resources
Oil Conservation Division
1220 South St Francis Drive
Santa Fe, NM 87505

**RE: Request for Discharge Plan (GW-035) Renewal
San Juan Basin Gas Plant
61 County Road 4900
Bloomfield, NM 87413**

Dear Sir / Madam,

The current Discharge Plan for the San Juan Basin Gas Plant expires on October 27, 2011. In accordance with 20.6.3.3109.H.(4) of the New Mexico Water Quality Control Commission Regulations, the San Juan Basin Gas Plant hereby requests the Discharge Plan approval be renewed. Enclosed for your review are two copies of the San Juan Basin Gas Plant's Discharge Plan and the \$100 filing fee.

As per 20.6.2.3108.C(2) NMAC, ConocoPhillips will submitted a public notice to the Farmington Daily Times in English and Spanish within 30 days of the Department deeming the application renewal administrative complete.

If you have any questions or require additional information, please contact me at 832-486-2887 or via email at beverly.j.cox@conocophillips.com.

Sincerely,

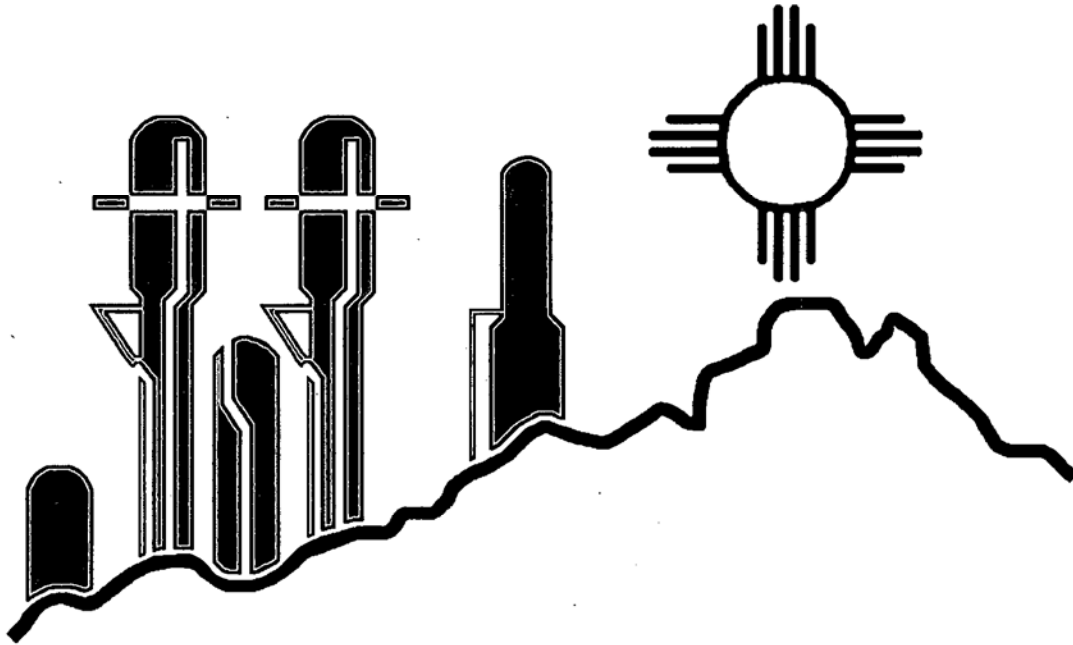
A handwritten signature in cursive script, reading "Beverly J. Cox".

Beverly J. Cox

Enclosed – 2 copies of renewal application

cc: OCD – District III, Aztec, NM
San Juan Basin Gas Plant – Bloomfield, NM
Beverly Cox – ConocoPhillips – Houston, TX

DISCHARGE PLAN GW-035



**SAN JUAN BASIN GAS PLANT
BLOOMFIELD, NEW MEXICO**

SAN JUAN COUNTY

June 2011

Prepared by

ConocoPhillips

San Juan Basin Gas Plant
61 County Road 4900
P. O. Box 217
Bloomfield, NM 87413

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 FACILITIES
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: ConocoPhillips - San Juan Basin Gas Plant

Address: 61 County Road 4900, Bloomfield, NM 87413

Contact Person: Beverly Cox Phone: (832) 486-2887

3. Location: NW 1/4 NW 1/4 Section 14 Township 29N Range 11W
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: Lane Ayers

Title: Manager, San Juan Gas Plants

Signature: 

Date: 6/17/2011

E-mail Address: g.lane.ayers@conocophillips.com

DISCHARGE PLAN TABLE OF CONTENTS

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Appendices

- A. Wastewater Collection System Schematic Diagram
- B. Process Flow Diagram
- C. Facility Plot Plan and Tank & Containment Location Plot Plan
- D. Facility Surface Drainage Map
- E. San Juan Plant Chemicals Stored and Used Inventory
- F. Waste Management Practices Chart
- G. Underground Vessels
- H. Piping Specifications
- I. Evaporation Pond Information and Details
- J. SPCC Plan - Table of Contents
- K. U.S. Department of the Interior Geological/Topographic
- L. Hydrogeologic Map of the San Juan Basin, New Mexico

I. Type of Operation

The San Juan Basin Gas Plant (SJBGP) is a natural gas processing plant. The SJBGP separates the natural gas liquids (ethane, propane, butanes, and condensate) from the methane gas (residue gas) through a cryogenic separation process. The residue gas is delivered to the El Paso Natural Gas Company.

Two natural gas streams are delivered from Enterprise's Blanco compressor station to the San Juan Basin Gas Processing Plant: (1) ~180 MMSCFD at ~350 psig and (2) ~320 MMSCFD at ~900 psig. Stream (1) is compressed at the San Juan Basin Gas Plant to ~900 psig for combination with Stream (2).

Prior to processing, all water must be removed from the gas stream because of low temperature in the cryogenic process. Separators are used to remove any free water. The gas then flows through molecular sieve dehydration beds to adsorb the entrained water. The beds are regenerated using hot gases flowing through the water-saturated desiccant. The hot wet gas is then cooled and the water is dropped out in a knockout vessel. Process wastewater flows into the Closed Drain Vessel (V-1402), then to the first Wastewater tank (TK-1203), and then to the Process Wastewater Tank (TK-1403). Stormwater and wash-water flow to the Skimmer Basin (M-1402), an oil-water separator. See Appendix A for a schematic of the wastewater system.

The dehydrated natural gas is then transferred to two parallel 250 MMSCFD liquid extraction trains which direct the gas through a series of heat exchangers to reduce the temperature to approximately -100 °F. A high-pressure cold separator removes any free liquefied hydrocarbons. These are directed to the demethanizer.

The vapor from the cold separator is fed to the turbo expander. A near isentropic expansion drops the vapor phase pressure to demethanizer pressure, both cooling the gas to -150 °F and delivering shaft work to the turbo expander recompressor. The turbo expander recompressor is used for boost compression of the residue gas.

The cold methane residue gas from the overhead of the demethanizer, goes to the cryogenic heat exchangers. The warmed gas is compressed by the turbo expander recompressor for transfer to residue compression, which consists of two 15,000 horsepower compressors, one for each train. These compressors increase residue gas pressure for delivery into the residue sales pipeline system.

In the demethanizer, ethane, propane, butane and condensate (EPBC) are liquefied and recovered. The EPBC is either fed to the deethanizer for PBC recovery or sent to the amine unit and then on to the Enterprise/MAPCO product pipeline for delivery to Mont Belvieu, Texas.

Ethane and some propane (EP), recovered at the top of the deethanizer, are either combined with the residue gas after final compression or shipped via the Enterprise/MAPL pipeline. The bottoms from the deethanizer contain mainly propane, butane, and condensate (PBC). This stream is transported via pipeline to the ConocoPhillips Wingate Plant.

The amine unit removes CO₂ from the EPBC product stream. Although inlet and residue gas H₂S concentrations meet pipeline quality standards, trace amounts of H₂S remain in the EPBC stream and are subsequently removed with the CO₂ from the product stream. The amine still unit vent gas is sent through the Thermal Oxidizer and heated to 1200 to 1500 °F for destruction of the H₂S.

Appendix B is a process flow diagram of the plant operations.

II. Operator/Legally Responsible Party & Local Representative

ConocoPhillips operates the San Juan Basin Gas Plant.

- a. Company contact:
Beverly Cox - Sr. Staff Environmental Technologist
ConocoPhillips - Gas Activities, Gathering and Processing
P. O. Box 2197
Houston, Texas 77252
(832) 486-2887
- b. Site Contact:
Todd Kinard - Compliance Coordinator
ConocoPhillips - San Juan Basin Gas Plant
P.O. Box 217
Bloomfield, NM 87413
(505)632-4954

III. Location of Discharge/Facility

The San Juan Basin Gas Plant is located 1.5 miles north of Bloomfield off Highway 550, in the NW 1/4, NW 1/4 Section 14, Township 29N, Range 11W in San Juan County. A facility plot plan and a U.S. Department of the Interior Geological Survey/Topographical Map are included in Appendices C and K, respectively.

IV. Landowners

ConocoPhillips and Enterprise Products jointly own the property that the San Juan Basin Gas Plant is located on.

ConocoPhillips
61 CR 4900
Bloomfield, NM, 87413
Lane Ayers (505) 632-4906

Enterprise Products
614 Reilly Avenue
Farmington, New Mexico, 87401
Joe Velasquez (505) 599-2200

V. Facility Description

In Appendix C there are two SJBGP Plot Plans (Facility Plot Plan and Tank & Containment Location Plot Plan) showing the facility boundaries, the location of fences, pits, dikes and tanks. These plot plans also identifies the locations of storage facilities, processing facilities, and other relevant areas.

VI. Material Stored or Used at the Facility

The materials stored or used at the San Juan Basin Gas Plant including the form of the material, the type of container, estimated volume, and location is provided in Appendix E.

All of the listed liquid materials are stored at atmospheric pressure in aboveground tanks with secondary containment (floor drains or dikes).

VII. Source and Quantities of Effluent and Process Fluids

- A. Below are the sources and types of major effluents, to include the estimated quantities and frequency generated.

SOURCE	QUANTITY PER MONTH/Year	ADDITIVES
1. Separators, Scrubbers, and Slug Catchers	Separator water, storm water, and wash-water are drained to TK-1403. The estimated quantity per month is 240,950 gallons.	N/A
2. Boilers, Waste Heat Recovery Units, Cogeneration Facilities, & Cooling Towers/Fans	Continuous cooling water blow-down is discharged to two evaporation ponds at ~550,000 gallons per month.	-anti-scale phosphates -sulfuric acid -chlorine -biocide (non-phenol based) Used as needed
3. Wash-down/Steam-out	N/A	N/A
4. Solvent/Degreaser use	15 gallons degreaser	N/A
5. Spent acids of caustics	N/A	N/A
6. Used Engine Coolants	N/A	N/A
7. Used Lubrication and Motor Oil	250 gallons	N/A
8. Used Lube Oil and Process Filters	10 yd./month	N/A
9. Solids and Sludge from Tanks, ponds (sludge from the bottom of the evaporation ponds, cooling tower)	60 cu. yd. /yr.	N/A
10. Painting Wastes, sand/bead blasting	< 1yd./month sand/bead blast media	N/A
11. Sewage	N/A	N/A
12. Laboratory Wastes	5 lbs.	Methanol, amine, other
13. Other wastes liquids	Spent HSW-4118 and water mix estimated quantity per month is 3500 bbls mix/yr.	N/A
14. Other waste solids (molecular sieve, activated alumina)	120 yd./yr. molecular sieve 20 yd./yr. activated alumina	N/A

B. Quality Characteristics

The major effluents and solid waste identified above are exempt from RCRA under the E&P exemption, 40 CFR 261 except for the pond sludge, some filters and the lab waste. RCRA non-exempt wastes are tested and profiled as needed. Analytical tests on liquid and solid wastes are obtained as required by the disposal facilities, state, or federal laws. The test results are kept on file at the plant and retained as per the ConocoPhillips retention

requirements.

C. Commingled Waste Streams

Water from the V-1402 separator, stormwater and wash-water are commingled in TK-1403, the wastewater tank. Baseline sampling documents that these wastewater streams are non-hazardous.

VIII. Current Liquid and Solid Waste Collection/Storage/Disposal Procedures

A. Summary Information

Appendix F provides summary information of the liquid and solid waste collection/storage and disposal practices at the San Juan Basin Gas Plant.

Additionally, the San Juan Basin Gas Plant property is graded with drainage from north to south. All process transfer and storage equipment has secondary containment. Process areas are located on graded concrete pads with drainage to the wastewater collection system. All other equipment foundations are connected to an open drain system that leads to the Skimmer Basin. At the skimmer, gravity separation segregates slop oil from wastewater. The slop oil (process liquids) is transferred by a float-operated pump to the Slop Oil Tank (TK-1402), and then sold to Giant Refinery. The wastewater, storm water, and wash water are diverted and transferred by a float-operated pump to the Process Wastewater Tank (TK-1403). Used equipment oil (equipment lube oil) is handled in the Used Lube Oil Drain Vessel (V-1401) and pumped to the Used Lube Oil Tank (TK-1402A).

Tanks are surrounded by concrete dikes or metal dikes with clay pads large enough to satisfy the OCD required capacity. The concrete containments are fitted with manually operated positive shut-off valves. These containments are drained only after visual inspection assures no oil sheen is present.

A storm water catch basin is constructed along the southwest property line to prevent any oil/water from leaving the facility. In the unlikely event of a significant amount of oil/water reaching this barrier, a third party cleanup will be authorized to remove any retained oil.

Some waste materials are handled in underground vessels or the skimmer pit. The oil/water skimmer is drained annually and visually inspected. All below grade vessels (V-806, V-807, and V-1401) are tested annually for mechanical integrity.

Sulfuric acid is stored in the Acid Storage Tank (V-1201) and is fed into the cooling water system to control the pH; thus stable pH of the blow-down water is maintained.

Methanol is used periodically to prevent freeze-ups in the plant process. The methanol stays in the product stream and leaves the plant with the NGL products.

Any losses of Diethanolamine (DEA) solution from the amine unit or amine process area are collected in the Waste Amine/Stormwater Tank (TK-803) and then gravity fed to the Process Wastewater Tank (TK-1403). As part of the Amine system, an H₂S scavenging chemical is used in TK-804 to scavenge the H₂S from the off gas of the amine system in the event the Thermal Oxidizer shuts down. When the chemical is spent, it is drained to the Waste Amine/Stormwater Storage Tank (TK-803) and then gravity fed to the Process Wastewater Tank (TK-1403).

Precautions have also been taken to prevent contamination of the storage tanks. For example, any oil that enters the open drain system must pass through the Skimmer Basin, an oil-water separator where oil will be removed. If that separator fails to operate properly, the oil-contaminated wastewater will be pumped to the TK-1403. Then, a specific gravity sensitive switch will alarm the Plant Operator to rectify the situation.

Only three underground vessels (V-806, V-807 and V-1401) are subject to this plan. Appendix G details characteristics and location of each tank. V-806 and V-807 are installed in the gas treating (amine system) area at an approximate depth of eight (8) feet. V-1401 is in the used oil system. No groundwater was encountered during the installation of these tanks.

The used oil (equipment lube oil) from V-1401 is collected and stored in TK-1402A on site. Safety Kleen recycles the used oil. They pick up the used oil periodically by truck. Oil filters are drained, dried and stored in special waste dumpsters awaiting disposal by Waste Management.

B. Collection and Storage Systems

1. Wastewater Flow Schematics

Appendix A is a diagram of the plant's wastewater system. Wastewater temperatures are not expected to exceed the ambient temperature.

2. Tankage and Chemical Storage Areas.

To prevent discharges from reaching surface and groundwater, the San Juan Basin Gas Plant has measures in place that meet the OCD design requirements outlined in the guidelines for discharge plans. Appendix C - Tank & Containment Location Plot Plan shows the location of tanks and containment areas.

3. Piping

In-plant piping was designed and tested in accordance with American National Standards Institute (ANSI) B 31.3. Most in-plant piping is carbon steel pipe. It was wrapped and checked with a holiday detector prior to installation. Design corrosion allowance is 0.063 inches. The 6-inch sanitary sewer line (Line No. 6 DY16101) is standard PVC pipe. The 3" waste water pipeline (Line No. 3 WP 14 4) is PE3408 SDR 9 polyethylene pipe. Appendix H lists the piping specifications and includes underground pipeline numbers with respective wall thickness, operating pressure and temperature; and design pressure and temperature.

All tanks and piping were pressure-tested prior to being placed in service to insure equipment integrity. Numerous pressure monitors are located on plant piping, tanks and vessels for leak detection.

Plant piping and equipment are designed to resist corrosion for the life of the facility. All underground steel piping is doped and wrapped. Above ground vessels and piping are tested for metal thickness approximately every two years. The three underground vessels (V-806, V-807 and V-1401) are pressure tested every year. Underground Process/Wastewater lines are tested on a 5 year interval. Additional testing is performed on an as-needed basis.

C. Existing Effluent and Solids Disposal.

1. On-Site Facilities

a. Surface impoundments

- (1) Two evaporation ponds were installed in 1993 and re-lined in 2001. The cooling tower blow-down is directed to these ponds. Appendix I provides details on the construction and operation of the ponds. Also included is a copy of the Pond's Monthly Leak Detection procedure. The evaporation ponds have an exception for netting by the OCD..
- (2) There are no on-site leach fields.
- (3) There are no on-site injection wells.
- (4) There is no on-site solids disposal.
- (5) There is no landfarm associated with the facility.

2. Off-site Disposal

A. Wastewater

The sources and estimated composition of the major wastewater streams are described in VII. Additional detail is provided in Appendix A.

Domestic wastewater and sewage are discharged via pipeline into the City of Bloomfield's wastewater treatment system:

City of Bloomfield
P.O. Box 1839
1076 South Church
Bloomfield, NM 87413

Separator water, stormwater, and washwater are collected in TK-1403 and transported by way of pipeline to Basin Disposal or by the following company:

Dawn Trucking
P.O. Box 1498
Farmington, NM 87499

Disposal wells owned by third parties are used for the effluent disposal. Two disposal sites are used so that storage capacities are not exceeded while one well is being repaired or worked over. One of the trucking companies delivers the wastewater to either of the following disposal wells:

Basin Disposal Well (Class II)
County Road 5046
Bloomfield, NM 87413

Key Energy Disposal Well (Class I)
3145 County Road 3500
Aztec, NM

B. Solids and sludge are trucked offsite to the appropriate landfill or landfarm at the following locations:

San Juan County Regional Landfill (solid waste)
78 County 3140
Farmington, NM 87499

Industrial Ecosystems, Inc. (land farm)
420 Cr. 3100
Aztec, NM 87410

Envirotech[~]
5796 Hwy 64
Farmington, NM 87401

IX. Proposed Modifications

There are no proposed modifications at this time.

X. Inspection, Maintenance and Reporting

A. Routine Evaporation Pond Inspections.

The evaporation ponds are double-lined and include an interstitial leak detection to monitor fluid containment. The leak detection devices are monitored monthly.

B. Groundwater Monitoring.

There is no groundwater monitoring at this time.

C. Procedures for Containment of Precipitation and Runoff.

The gas treating area is contained with concrete flooring and curbed, providing secondary containment of potentially contaminated stormwater and/or washwater and any spills. The curbed area drains to TK-803, a 500-barrel tank.

All other equipment foundations are equipped with drains to collect dripped fluids and washwater. These areas drain to TK-1403. A primary catchment basin was constructed inside the fence at the south edge of the property. The catchment basin contains all other stormwater, preventing any runoff to surrounding areas. A field road just outside the fence property provides secondary containment to prevent any stormwater from reaching Citizen's Ditch. Precautions to eliminate runoff contamination have been taken. If for any reason contamination should occur, a third party will be contacted immediately to provide whatever services are necessary to remedy the situation. A list of service providers is maintained in the SPCC Plan.

Oil pads are used liberally to cleanup small spills. This prevents future groundwater contamination.

Washwater from equipment cleaning and maintenance is sent via the drain system to the wastewater tanks for proper disposal.

XI. Spill/Leak Prevention and Housekeeping Procedures

A. Containment and Cleanup of Spills

As required by Federal regulations, 40 CFR 112, the San Juan Basin Gas Plant operates in compliance with an SPCC Plan. The SPCC Plan table of contents is shown in Appendix J.

The SPCC plan specifies containment requirements for tanks and other equipment. All tanks that are used to store hydrocarbons or liquids at standard temperature and pressure or hazardous substances are diked or curbed to prevent releases in the event of tank failure.

Plant personnel receive annual training on spill prevention, containment, cleanup, and notification procedures. In the event of a spill of oil or other regulated materials, the Oil Conservation Division and the Environmental Improvement Division shall be notified as necessary.

XII. Site Characteristics

A. Hydrologic Features

Appendix L, the New Mexico Bureau of Mines & Mineral Resources Hydrogeologic Map of the San Juan Basin illustrates the area surrounding the facility. All bodies of water, rivers, and canals are labeled.

B. Geologic Description of Discharge Site

Appendix K is a U.S. Department of the Interior Geological Survey/Topographic Map. The soil is Fruitland sandy loam, 0-2 percent slopes. Appendix L provides Hydrogeologic data for the area.

C. Flood Protection

Site work including grading changes was conducted prior to commencement of construction. A Facility Surface Drainage map is included in Appendix D. The entire plant site is elevated to effectively eliminate any potential for flooding. Sources of potential stormwater contamination are curbed to prevent such contamination.

XIII. Closure Plan for San Juan Gas Plant

In the event the SJBGP were to cease operation and close the Plant, SJBGP will submit a formal closure plan to the NMOCD for prior approval.

XIV. Copies

Copies of the discharge plan have been provided as follows:

Original plus one copy to the Santa Fe office.

One copy to the OCD Aztec office.

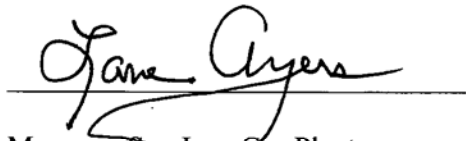
One copy to Beverly Cox.

One copy to the SJBGP
One copy to Lane Ayers

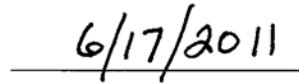
XV. Certification

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

Lane Ayers

A handwritten signature in black ink, appearing to read "Lane Ayers", is written over a horizontal line.

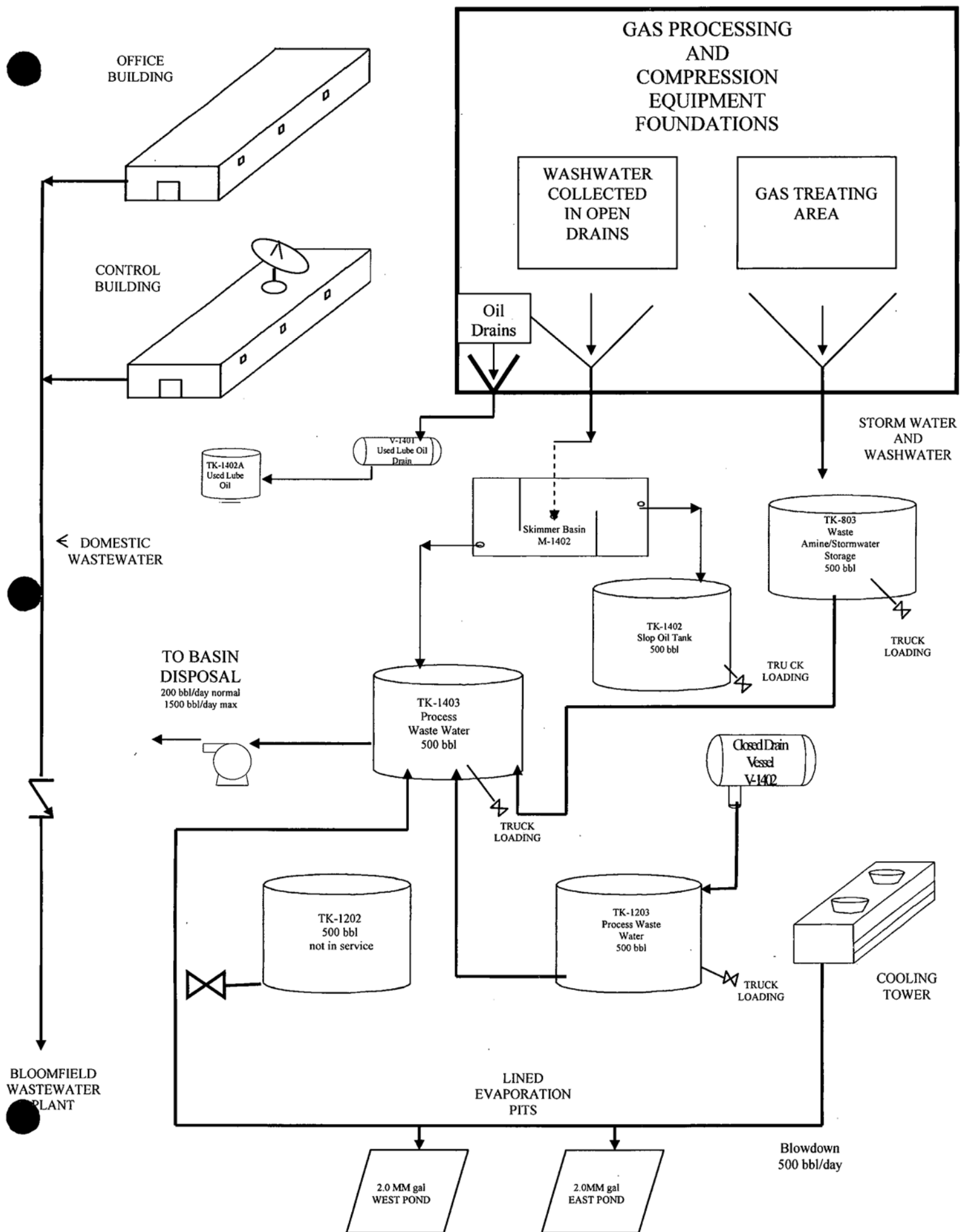
Manager, San Juan Gas Plants
San Juan Basin Gas Plant
L48 San Juan Business Unit

A handwritten date "6/17/2011" is written in black ink over a horizontal line.


ConocoPhillips

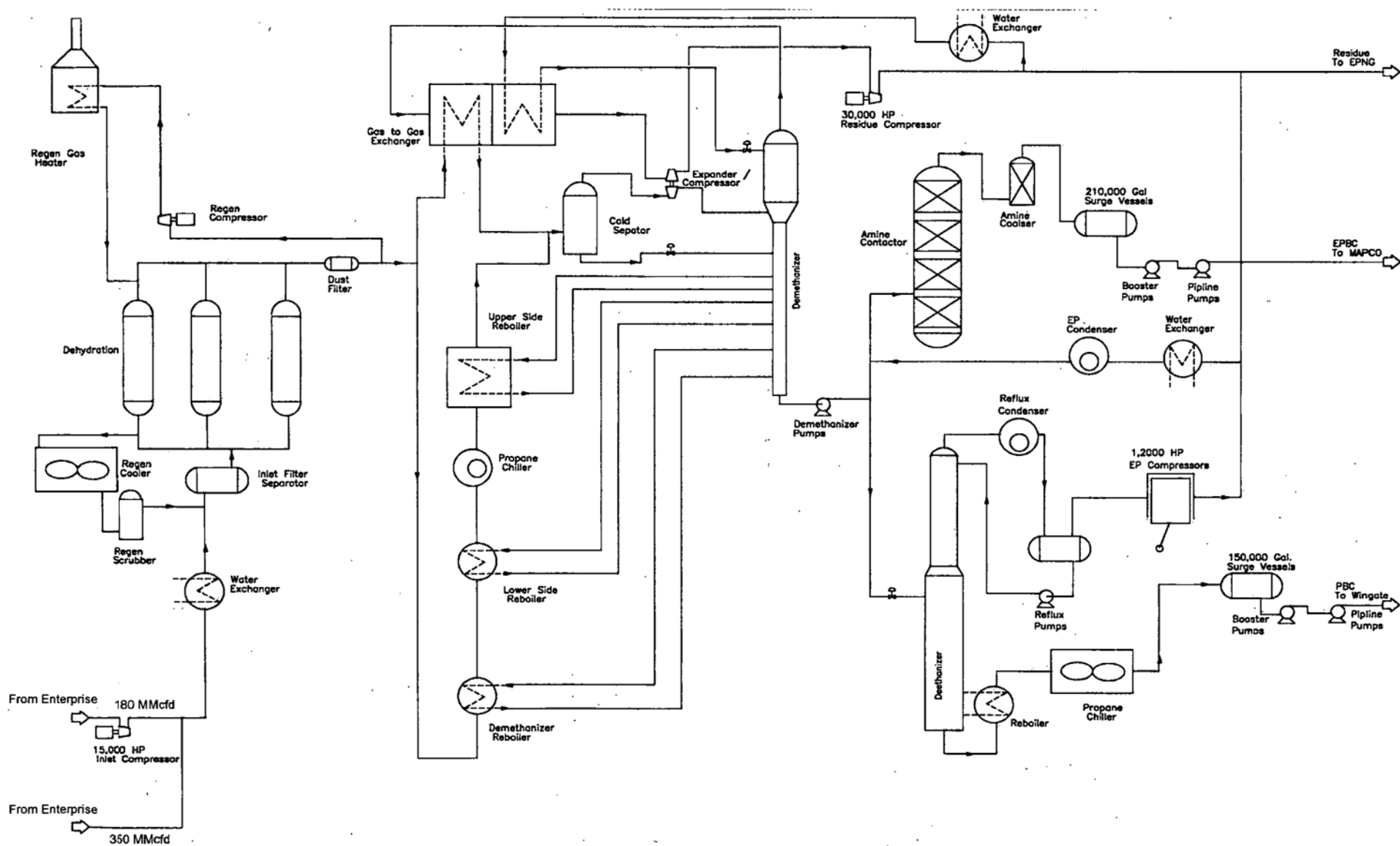
Appendix A

Wastewater Collection System Schematic Diagram



Appendix B
Process Flow Diagram

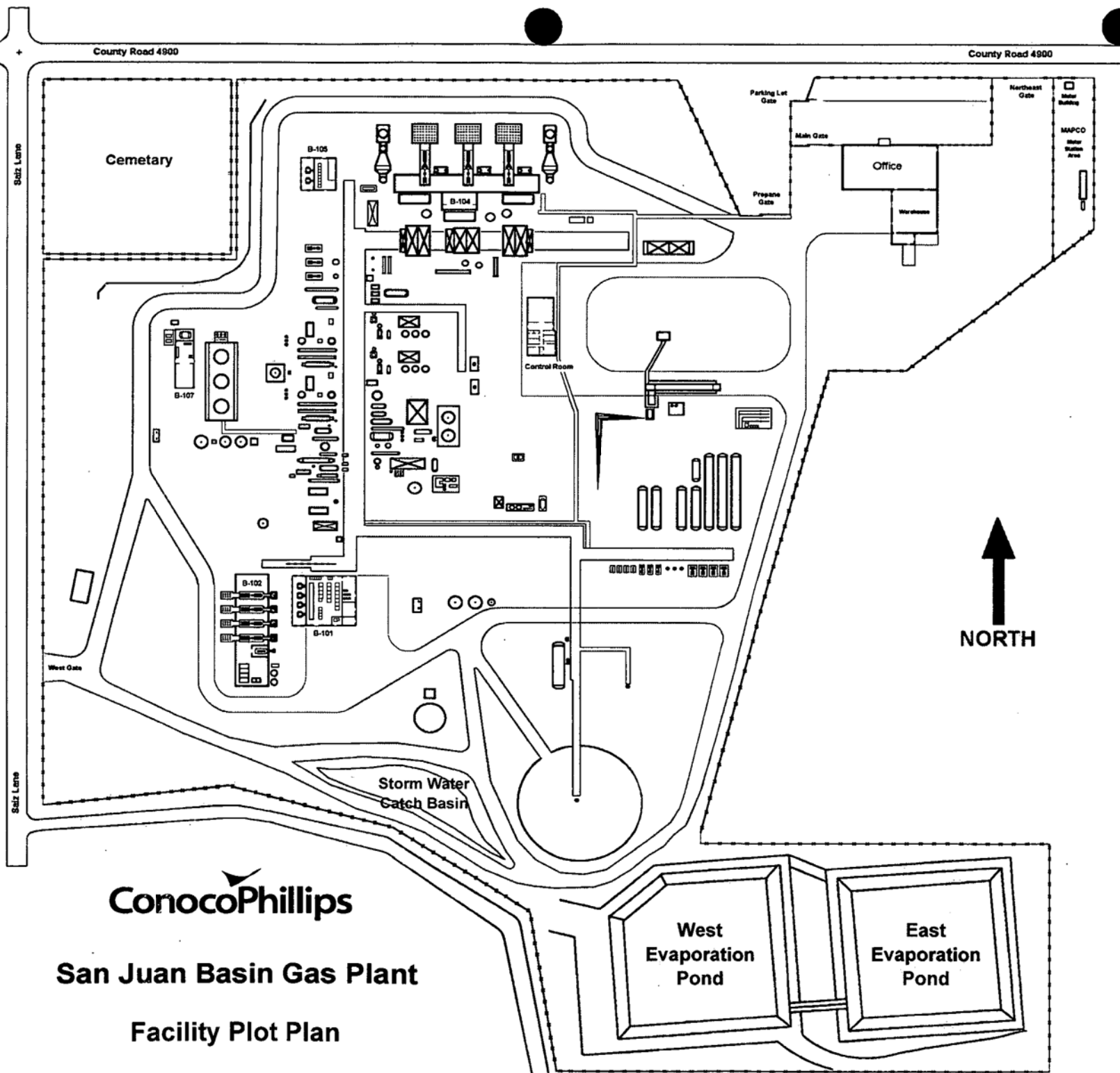
San Juan Basin Gas Plant - Process Flow Diagram



Appendix C

Facility Plot Plan

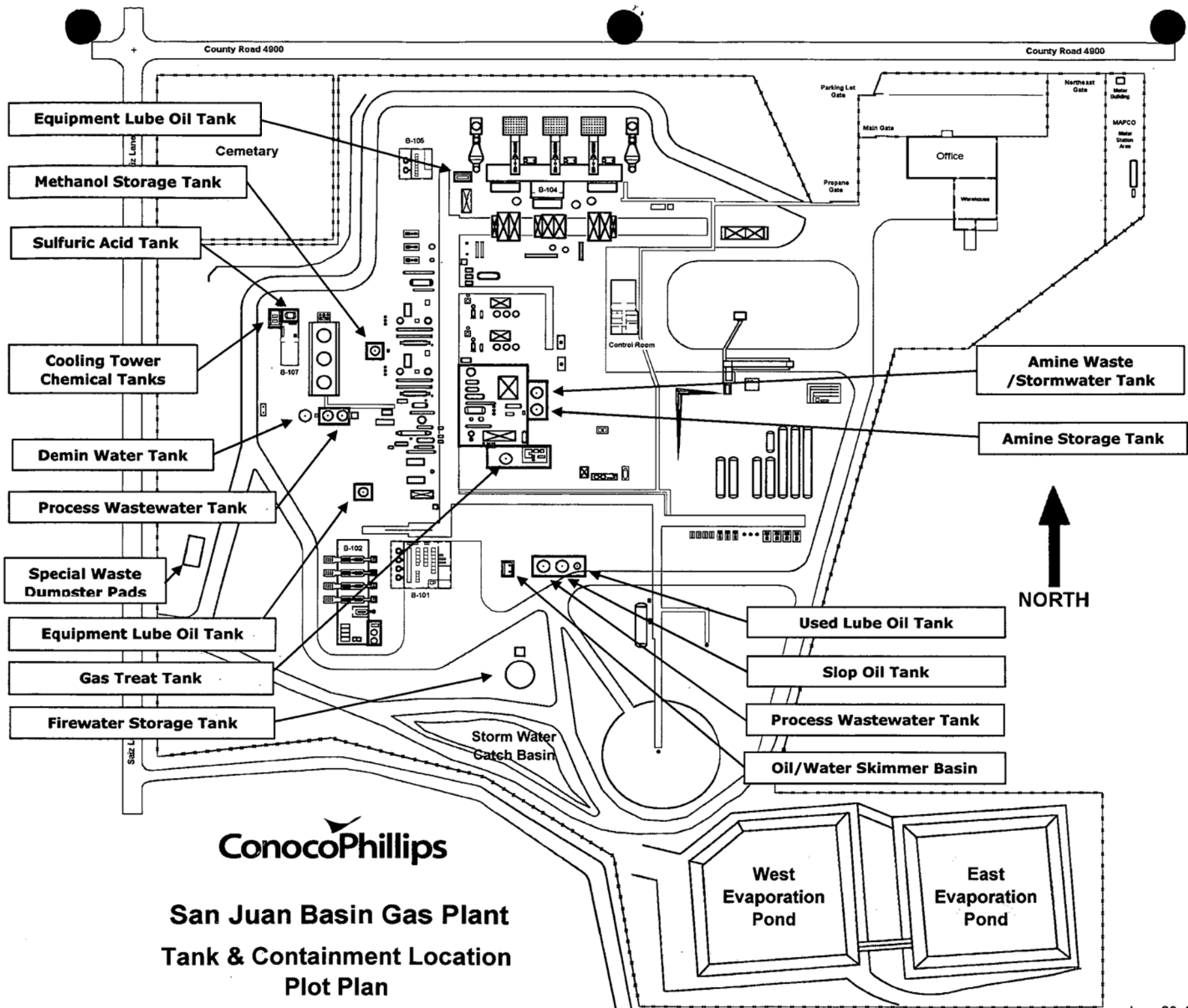
Tank & Containment Location Plot Plan



ConocoPhillips

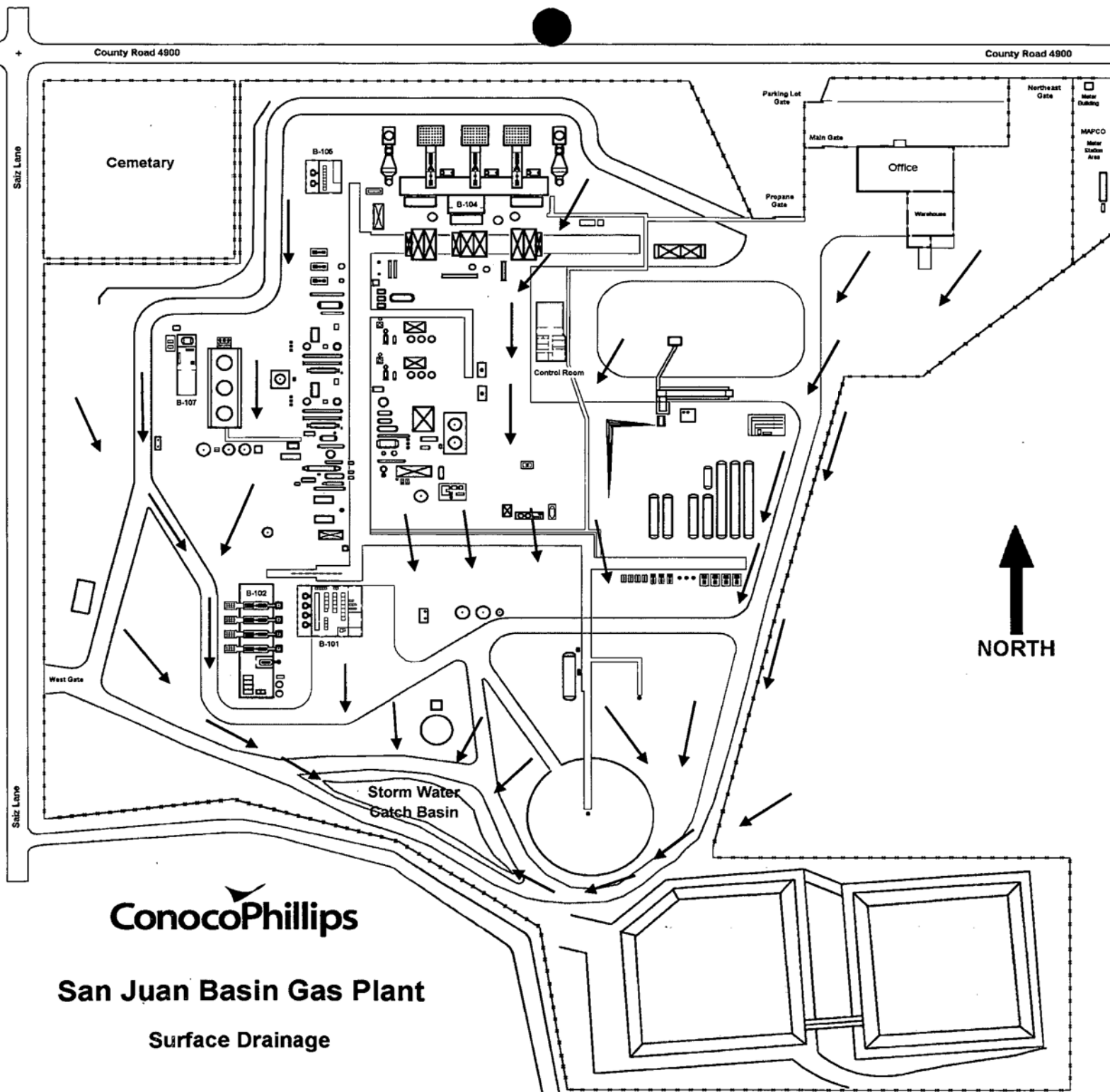
San Juan Basin Gas Plant

Facility Plot Plan



Appendix D

Facility Surface Drainage Plot Plan



ConocoPhillips

San Juan Basin Gas Plant

Surface Drainage

Appendix E

San Juan Basin Gas Plant Chemicals Stored and Used Inventory

**SAN JUAN PLANT
CHEMICAL STORAGE INVENTORY**

1 of 2

Chemical	Spec. Grav.	Manufacturer	Hazards	Quantity (Lbs)		Days On Site	Location
				Maximum	Average		
Butane/Gasoline Mix			A,C,F	97,000	90,000	365	Process
Carbon Dioxide	1.65	General Electric	A	50,000	40,000	365	Process & Amine Area
Condensate (Natural Gasoline)			A,C,F	245,108	100,000	365	Process & Storage Area
Diesel, No. 2	0.93		A,C,F	33,900	18,300	365	Solar & Firewater Pump Bldgs Between TK-801 and TK-802
Diethanolamine 85%	1.08	VoPak USA	A,C	200,000	100,000	365	TK-801
Ethane			A,F,P	134,650	110,000	365	Process & Surge Area
Hydrogen Sulfide			(2)EH/A,C, F,P	2,000	1,500	365	Amine Area
							Amine Area
Methane (Sweet Natural Gas)			A,F,P	1,100,000	1,000,000	365	Process & Compression
Methanol	0.79	DuPont	A,C,F	70,000	23,000	365	TK-1401
PBC Mix/EPBC Mix			A,C,F	1,431,800	505,165	365	Product Surge Tanks
Propane			A,F,P	208,304	185,670	365	Refrigerant Area
Slop Oil	0.71		A,C,F	125,000	62,500	365	TK-1402
Sulfuric Acid		Koch	(2)EH/A,C, R	22,000	10,000	365	V-1201 & Cooling Twr
Activated Alumina		Alcoa					
Angry Orange Biodegradable Degreaser	1.06	American Sales and Service	BT/A			365	B-107
Asto 500	1.00	Royal Lubricants Co.	NH			365	B-107
A. T. Fluid Type F			NH	800	600	365	B-107
B&B 3100	0.95	B&B Chemical Co.	BT/A	300	200	365	Shop
Barrier Fluid FDA		Royal Purple	BT			365	B-107
Benzene		DuPont		Not Stored found in PBC/EPBC			
Butane/Isobutane			A,F,P			365	
Capella Oil WF68 (01562)	0.91	Texaco	NH	2,700	2,000	365	B-107
Cecarbon Activated Carbon	2.10	Atochem	BT/A	2,000	1,100	365	Oil Storage
Cer-Wool Blanket Types: HT, HP, RT, LT		C-E Refractories					
Cer-Wool Moldable F		C-E Refractories					
Cerablanket		Manville Bldg Materials					
Chemguard Purple-K Dry Chemical		Chemguard Inc.	NH	300	200	365	Oil Stge
Dectol R. O. Oils			NH	3,600	2,300	365	B-107
Denstone 57 (D-57)		Norton		Not Stored			
Dexron III and Mercon			NH	800	500	365	B-107

**SAN JUAN PLANT
CHEMICAL STORAGE INVENTORY**

2 of 2

Chemical	Spec. Grav.	Manufacturer	Hazards	Quantity (Lbs)		Days On Site	Location
				Maximum	Average		
Dianodic DN2761		GE Betz, Inc.		5,700	3,200	365	Cooling Tower
Dianodic DN2318		GE Betz, Inc.		4,400	2,400	365	Cooling Tower
F-10 Biodegradable Soap		American Sales and Service	BT/A			365	B-107
Foamglas Insulation		Pittsburgh Corning					
Foam-trol AF 1440	0.84	GE Betz, Inc.	BT	386		365	Cooling Tower
Gear Oils 68, 100, 150,			NH	2,500	2,000	365	B-107
HD Fleet Engine Oil/HD Fleet Supreme			NH	1,600	800	365	B-107
HSW 4118		Baker Petrolite	BT			365	TK-804
Hydroclear Heat Transfer Oil			NH	180,000	175,000	365	V-1101
Hydroclear Super All-Season Motor Oil			NH			365	B-107
Hydroclear Turbine Oil			NH	100,900	57,000	365	B-107
Micro-Lok Fiber Glass Insulation		Johns Manville					
Molecular Sieve Type 4ADG		UOP LLC					Inlet Dehydration
Molecular Sieve Type UI-94		UOP LLC					Inlet Dehydration
Osmonic's Detergent NP-03		Osmonics, Inc.	BT	10	5	365	Cooling Tower
RPA - 804		Champion Tech.	BT/A,C, F			307	By TK-804
Safety-Kleen Premium Gold Solvent		Safety-Kleen Corp.	BT	250	0	365	Shop
Sahara DG Herbicide		American Cyanamid		Not Stored			
Soda Ash		Rhone-Poulenc Basic Chemicals Co.	BT/A	2,500	1,250	365	Cooling Tower
Sodium Hypochlorite BD-1500	1.215	GE Betz, Inc.	A	5,070	2,535	365	B-107
Spectrus BD1500		GE Betz, Inc.		470	470	365	Cooling Tower
Spectrus NX1100		GE Betz, Inc.		Not Stored			
Spectrus OX1201		GE Betz, Inc.	BT			160	B-107
Super Hydraulic Oil 22, 32,...			NH	4,800	3,000	365	B-107
Super-Sta Grease			NH	20	10	365	Oil Storage
Surflo S1259	1.45	Exxon Chemical	BT/A,C			365	B-107
Syncon Synthetic R&O Oil			NH			365	Solars & TK-1300
Tretolite CGW0437D	1.45	Petrolite	BT/A,C			365	Inlet Area
Unleaded Gasoline	0.77		BT	500	250	365	Outside Warehouse

Hazards: NH = Not Hazardous

BT = Below Threshold

EH = Extremely Hazardous Substance

A = Acute

C = Chronic

F = Fire

P = Pressure

R = Reactive

(2) Hydrogen Sulfide (500 = Threshold Qua

(3) Sulfuric Acid (100 = threshold Quantity)

Appendix F

Waste Management Practices Chart

San Juan Gas Plant

Appendix F

Waste Management Practices

<u>Solid Waste</u>	<u>OCD Rule</u> <u>19.15.35</u>	<u>Process Generating</u> <u>Waste</u>	<u>Number</u> <u>of Units</u>	<u>Quantity</u> <u>per unit</u>	<u>Totals</u>	<u>Frequency</u> <u>of change</u> <u>"Months"</u>	<u>Annualized</u> <u>Waste</u> <u>Generated</u>	<u>Disposal</u>
Amine Sock Filters	8.C.2.c	Amine System	1	200	200	3	800	- Drain, dried, keep separate, & disposed at local landfill
Amine Charcoal Filters	8.C.2.c	Amine System	1	45	45	3	180	- Drain, dried, keep separate, & disposed at local landfill
D-R Lub Skid Filters	8.C.2.o	D-R Compressor Units	3	51	153	24	76.5	- Drain, dried, keep separate, & disposed at local landfill
Solar Lub Skid Filters	8.C.2.o	Solar Generator Units	4	5	20	12	20	- Drain, dried, keep separate, & disposed at local landfill
Refrigeration Compressor Lub Filters	8.C.2.o	Refrig. Compressor Units	3	1	3	12	3	- Drain, dried, keep separate, & disposed at local landfill
EP Compressor Lub Filters	8.C.2.o	EP Compressor Units	2	1	2	12	2	- Drain, dried, keep separate, & disposed at local landfill
Instrument Air Compressor Filters	8.C.2.o	Instrument Air Units	3	9	27	12	27	- Disposed of at local landfill
Instrument Air Dehy Filters	8.C.2.f	Instrument Air Dehy System	1	10	10	6	20	- Disposed of at local landfill
Expander Lub Skid Filters	8.C.2.o	Expander Lub Skid	2	3	6	12	6	- Drain, dried, keep separate, & disposed at local landfill
Emergency Generator Filters	8.C.2.o	Emergency Generator	1	10	10	12	10	- Drain, dried, keep separate, & disposed at local landfill
Fire Water Pump Filters	8.C.2.o	Fire Water Pump	1	3	3	12	3	- Drain, dried, keep separate, & disposed at local landfill
Regen Compressor Lub Filters	8.C.2.o	Regen Compressors	2	1	2	24	1	- Drain, dried, keep separate, & disposed at local landfill
P-903 Pump Lub Filters	8.C.2.o	EPBC Pumps	4	1	4	6	8	- Drain, dried, keep separate, & disposed at local landfill
Inlet Gas Filters	8.C.2.g	Inlet Gas Dehy Units	2	28	56	6	112	- Drain, dried, keep separate, & disposed at local landfill
Inlet Gas Coalescing Filters	8.C.2.g	Inlet Gas Dehy Units	2	27	54	12	54	- Drain, dried, keep separate, & disposed at local landfill
Inlet Gas Dust Filters	8.C.2.f	Inlet Gas Dehy Units	2	55	110	6	220	- Drain, dried, keep separate, & disposed at local landfill
EPBC Coalescing Filters	8.C.2.g	EPBC Dryer Unit	1	25	25	3	100	- Drain, dried, keep separate, & disposed at local landfill
Avon Inlet Air Filters	8.C.1.k	D-R Compressor Units	3	224	672	24	336	- Disposed of at local landfill
Solar Inlet Air Filters	8.C.1.k	Solar Generator Units	4	48	192	24	96	- Disposed of at local landfill
					Total Annual Filters Waste:		2,075	
Molecular Sieve U/94	8.C.2.k	Inlet Gas Dehy Units	6	586 ft3	3516 ft3	36	1,172 ft3	- Disposed of at local landfill
Support Balls	8.C.3.j	Inlet Gas Dehy Units	6	33 ft3	198 ft3	36	99 ft3	- Disposed of at local landfill
Activated Alumina	8.C.2.a	EPBC Dryer Units	2	195 ft3	390 ft3	36	130 ft3	- Disposed of at local landfill
Activated Alumina	8.C.2.a	Instrument Air Dryer Unit	1	16 ft3	16 ft3	12	16 ft3	- Disposed of at local landfill
Activated Carbon	8.C.2.b	Instrument Air Dryer Unit	1	4 ft3	4 ft3	12	4 ft3	- Disposed of at local landfill
Oil Absorbing Material	8.C.1.n	Clean-up around Plant	-	675 ft3	675 ft3	4	2,025 ft3	- Drain, dried, keep separate, & disposed at local landfill
Evaporation / Cooling Tower sediment & pads	8.C.3.n	Cooling Tower	3	25 yd3	75 yd3	12	60 yd3	- Drain, dried, keep separate, & disposed at local landfill
Pipe scale	8.C.2.l	Piping and Equipment	-	-	-	-	-	- Disposed of at local landfill
Oily Rags	8.C.1.n	Plant maintenance activities	-	-	-	-	-	- Drain, dried, keep separate, & disposed at local landfill
Contaminated soil/gravel (other than petroleum)	8.C.3.c	Plant maintenance activities	-	-	-	-	~3-5 yd3	- Sent to local landfarm for cleaning and recycling
Insulation Material	8.C.3.f	Plant maintenance activities	-	-	-	-	-	- Disposed of at local landfill
Aerosol Cans	N/A	Plant maintenance activities	-	-	-	-	-	- Safety Kleen pick up
Paper Trash	8.C.1.k	Office Trash	-	-	-	-	-	- Disposed of at local landfill
Sand Blasting Media - B/B Abrasive	8.C.2.n	Sand blasting	-	-	-	-	-	- Disposed of at local landfill
Florescent lamps	N/A	Office lighting, Plant lighting	-	-	-	-	-	- Safety Kleen pick up
NORM Contaminated solids (sand)	9. - 15.	Tank Cleaning	-	TBD	TBD	TBD	TBD	- Case by Case determination
<u>Liquid Waste</u>		<u>Process Generating</u> <u>This Waste</u>	<u>Storage</u> <u>Unit</u>	<u>Quantity</u> <u>per Day</u>	<u>Quantity</u> <u>per Month</u>		<u>Annualized</u> <u>Waste</u> <u>Generated</u>	
Produced Waste Waters		Inlet Scrubber Dumps	TK-1403	7,900	240,950	-	2,891,400 gal	- Pumped/hailed to Disposal Well
CT Blowdown water		Cooling Tower	Ponds	18,000	550,000	-	6,600,000 gal	- SJ Evaporation ponds or Disposal Well
Waste Amine		Waste Amine System	TK-803	3,600	10,920	-	131,040 gal	- Pumped/hailed to Disposal Well
Slop Oil (process liquids)		Inlet Scrubber Dumps	TK-1402	25	760	-	9,120 gal	- Sale to Giant Refinery
Solvents		Parts cleaning Unit	-	-	40	-	480 gal	- Recycled
Paint & Activator		Plant maintenance activities	-	-	-	-	-	- Use up all paint, dry out cans, & dispose at local landfill
Waste oil (equipment lube oils)		Compressors/Turbines	TK-1402A	-	250	-	3000	- Recycled
Lab Waste		Laboratory	Satellite Accumulation	-	5 lbs.	-	60 lbs.	- As needed upon OCD approval
Spent H2S scavenging solution HSW-4118		Amine System	TK-804	-	-	-	25,200 gal	- As needed to Disposal Well

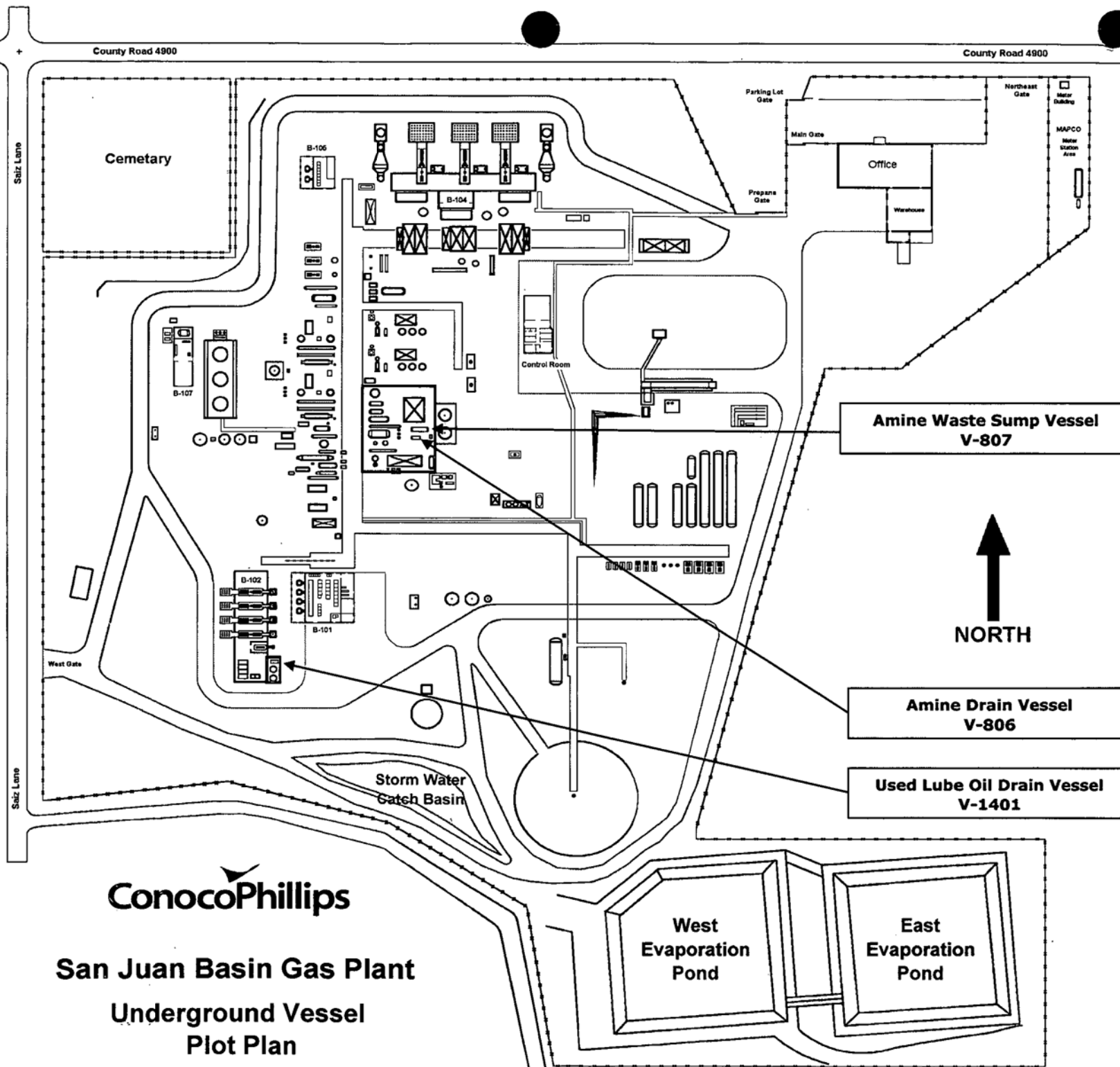
Appendix G
Underground Vessels

Appendix G

UNDERGROUND VESSELS

Vessel Number	V-806	V-807	V-1401
Vessel Name	Amine Drain	Amine Waste Sump	Used Lube Oil Drain
Commodity Stored	30% Diethanolamine ⁽¹⁾	Storm water ⁽²⁾	Waste oil
Capacity (gal)	950	4200	650
Construction Material	Carbon Steel	Carbon Steel	Carbon Steel
Dimensions	48" OD x 10' T/T	72" OD x 20' T/T	42" OD x 8' T/T
Wall Thickness ⁽³⁾	0.25"	0.25"	0.25"
External Protection	Epoxy Coating	Epoxy Coating	Epoxy Coating
Design Pressure ⁽⁴⁾	16 psig @ 150 degrees	16 psig @ 150 degrees	16 psig @ 200 degrees

- (1) DEA solution from system blowdown. This material can be returned to the process unit or disposed of via TK-803
- (2) Stormwater from curbed gas-treating area; stormwater through drain to TK-803 via V-807
- (3) Wall thickness includes 0.125" corrosion allowance
- (4) All vessels were pressure tested prior to installation and are tested every year



ConocoPhillips

**San Juan Basin Gas Plant
Underground Vessel
Plot Plan**

Appendix H
Piping Specifications

PIPING SPECIFICATIONS

<u>LINE NUMBER</u>	<u>SCH OR WT</u>	<u>OPER. PRES.</u>	<u>OPER. TEMP.</u>	<u>DESIGN PRES.</u>	<u>DESIGN TEMP.</u>
<u>Cooling Water</u>					
1.5" WC 12 135	80	70	80	100	150
1.5" WC 12 136					
1.5" WC 12 141					
1.5" WC 12 142					
2" WC 12 115	80	70	71	100	150
2" WC 12 116					
2" WC 12 134					
3" WC 12 108	STD	70	71	100	150
3" WC 12 109					
3" WC 12 124	STD	50	81	100	150
3" WC 12 125					
6" WC 12 101	STD	50	81	100	150
6" WC 12 117					
6" WC 12 120					
8" WC 12 104	STD	70	71	100	150
8" WC 12 139					
8" WC 12 140	STD	50	81	100	150
10" WC 12 101	STD	70	71	100	150
10" WC 12 103					
10" WC 12 106					
10" WC 12 107					
10" WC 12 119	STD	50	81	100	150
10" WC 12 122					
10" WC 12 123					
10" WC 12 131					
12" WC 12 118	STD	50	81	100	150
14" WC 12 101	STD	50	81	100	150
14" WC 12 131					
16" WC 12 131	STD	50	81	100	150
24" WC 12 101	STD	70	71	100	150
24" WC 12 132					
<u>Firewater</u>					
8" WF 14 104	STD	ATM	AMB	NA	NA
8" WF 14 105					
8" WF 14 107					
8" WF 14 109					
8" WF 14 110					
8" WF 14 111					
8" WF 14 112					
8" WF 14 113					
12" WF 14 100	STD	ATM	AMB	NA	NA
12" WF 14 102					
12" WF 14 109					

PIPING SPECIFICATIONS - (Continued)

<u>LINE NUMBER</u>	<u>SCH OR WT</u>	<u>OPER. PRES.</u>	<u>OPER. TEMP.</u>	<u>DESIGN PRES.</u>	<u>DESIGN TEMP.</u>
<u>Utility Water</u>					
1" WU 14 109	80			200	150
1" WU 14 110					
1" WU 14 111					
1" WU 14 112					
1" WU 14 113					
1" WU 14 114					
1" WU 14 115					
1" WU 14 116					
1" WU 14 118					
1" WU 14 119					
3" WU 14 101	10S	ATM	AMB	100	150
4" WU 14 102	STD			200	150
6" WU 14 101	0.280			200	150
<u>Treated Water</u>					
1.5" WT 14 111	40S	50	AMB	100	150
2" WT 14 104	40S	50	AMB	100	150
3" WT 14 101	10S	ATM	AMB	100	150
<u>Drinking Water</u>					
1.5" WD 14 104	STD	60	70	100	150
1.5" WD 14 106					
1.5" WD 14 107					
1.5" WD 14 108					
2" WD 14 101	STD	60	70	100	150
3" WD 14 101	STD	60	70	100	150
<u>Process Hydrocarbon Liquids</u>					
3" HL 14 106	STD	ATM	AMB	50	150
4" HL 9 180	80	820	110	1415	150
6" HL 9 159	80	1687	83	1815	150
6" HL 9 182					
8" HL 9 161	0.322	1687	83	1815	150
<u>Process Hydrocarbon Gas</u>					
20" HG 1 101	STD	345	110	596	150
20" HG 1 112	0.750	845	110	940	150
24" HG 1 111	0.750	845	80	940	150
24" HG 2 110	0.750	850	120	940	150

PIPING SPECIFICATIONS - (Continued)

<u>LINE NUMBER</u>	<u>SCH OR WT</u>	<u>OPER. PRES.</u>	<u>OPER. TEMP.</u>	<u>DESIGN PRES.</u>	<u>DESIGN TEMP.</u>
<u>Amine</u>					
2" XA 8 125	80	36	70	272	200
2" XA 8 132					
2" XA 8 144					
2" XA 8 145	80	ATM	AMB	100	150
2" XA 8 146					
2" XA 8 150	80	22	AMB	200	150
2" XA 8 151					
2" XA 8 153					
2" XA 8 160					
3" XA 8 129	STD	ATM	AMB	100	150
3" XA 8 142	STD	12	248	100	300
6" XA 8 100	STD	ATM	AMB	100	150
6" XA 8 148					
<u>Refrigerant</u>					
1.5" RF 10 140	80	200	100	250	150
2" RF 10 113	80	70	44	250	150
3" RF 10 141	STD	200	100	250	150
<u>Fuel Gas</u>					
2" FG 14 112	80	60	42	110	175
<u>Flare</u>					
2" FL 14 240	80	ATM	AMB	50	-20/260
2" FL 14 241					
<u>Methanol</u>					
2" XX 14 101	80	50	110	100	150
<u>Sanitary Sewer</u>					
6" DY 14 101	Standard PVC pipe				
<u>Closed Drain System</u>					
1" DC 14 135	80	300	80	350	275
2" DC 14 102	80	300	80	350	275
2" DC 14 107	40S	40	-200	50	-220/350
2" DC 14 110					
2" DC 14 116					
3" DC 14 101	STD	300	80	350	275
3" DC 14 122	10S	40	-200	50	-220/350
3" DC 14 127					
4" DC 14 109	10S	40	-200	50	-220/350
4" DC 14 112					
6" DC 14 123	10S	40	-200	50	-220/350

PIPING SPECIFICATIONS - (Continued)

<u>LINE NUMBER</u>	<u>SCH OR WT</u>	<u>OPER. PRES.</u>	<u>OPER. TEMP.</u>	<u>DESIGN PRES.</u>	<u>DESIGN TEMP.</u>
<u>Open Drain System</u>					
2" DO 14 102	80	ATM	AMB	50	150
2" DO 14 103					
2" DO 14 109					
2" DO 14 110					
2" DO 14 114					
2" DO 14 119					
2" DO 14 120					
2" DO 14 121					
2" DO 14 124					
2" DO 14 125					
2" DO 14 129					
2" DO 14 131					
2" DO 14 132					
2" DO 14 133					
2" DO 14 134					
2" DO 14 135					
2" DO 14 136					
2" DO 14 137					
2" DO 14 142					
2" DO 14 143					
2" DO 14 144					
2" DO 14 145					
2" DO 14 146					
2" DO 14 147					
2" DO 14 149					
2" DO 14 153					
2" DO 14 157					
2" DO 14 158					
2" DO 14 173					
2" DO 14 183					
2" DO 14 202					
3" DO 14 104	STD	ATM	AMB	50	150
3" DO 14 112					
3" DO 14 126					
3" DO 14 150					
3" DO 14 151					
4" DO 14 107	STD	ATM	AMB	50	200
4" DO 14 155					
6" DO 14 138	STD	ATM	AMB	50	150
6" DO 14 140					
<u>Instrument Air</u>					
1" AI 14 118	STD	125	120	150	300
1" AI 14 119					
<u>Utility Air</u>					
2" AU 14 109	STD	125	120	150	300

PIPING SPECIFICATIONS

<u>LINE NUMBER</u>	<u>SCH OR WT</u>	<u>OPER. PRES.</u>	<u>OPER. TEMP.</u>	<u>DESIGN PRES.</u>	<u>DESIGN TEMP.</u>
<u>Waste Water Disposal</u>					
3" WP 14 4	PE3408 SDR 9	150	N/A	200	N/A

Appendix I

Evaporation Pond Information and Details

Evaporative Pond Details

Operation

Two evaporative ponds have been constructed according to the as-built drawing attached with 3:1 slopes on both sides of each levee, a maximum height of 10' and total lined surface area of 115,500 sq. ft. (2.65 acres). The tops of the levees are wide enough to provide a service road access around the ponds. Transference of water from one pond to the other is managed by manifold/valve operation.

The ponds are sized as follows:

	West Pond	East Pond
Base Elevation	94'	102'
Levee Elevation	102'	110'
Area (berm to berm)	183'x226' = 41,357 sq. ft.	234'x230' = 54,510 sq. ft.
Area (@ 6' depth)	171'x214' = 36,594 sq. ft.	225'x218' = 49,050 sq. ft.
Volume (@ 6' depth)	1.35 million gallons	2.20 million gallons
Sprinkling system	Spray deck	Spray deck

Each pond is equipped with a sprinkler system to enhance the yearly solar evaporation rate and a control system to shut down the pumps during high winds to control over spray.

The primary liner (top) in each pond is a 60 ml HDPE (High Density Poly Ethylene) liner and the secondary is a 40 ml HDPE. Between the primary and secondary liners is a Geonet, which allows for vapor space and a path for any water to travel to the corner of the pond where the leak detection system is located. On the west pond it is in the NE corner and on the east pond it is in the NW corner. A 6" PVC line is positioned between the primary and secondary liner from the bottom of the pond to the top of the pond for leak detection. On a monthly basis, the 6" PVC leak detection line is checked for water and documented. See "Evaporative Pond Monthly Leak Detection" procedure for proper testing and documentation requirements.

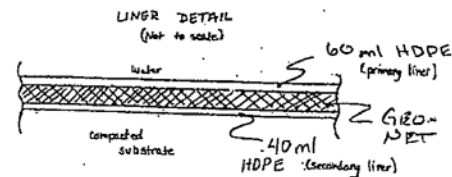
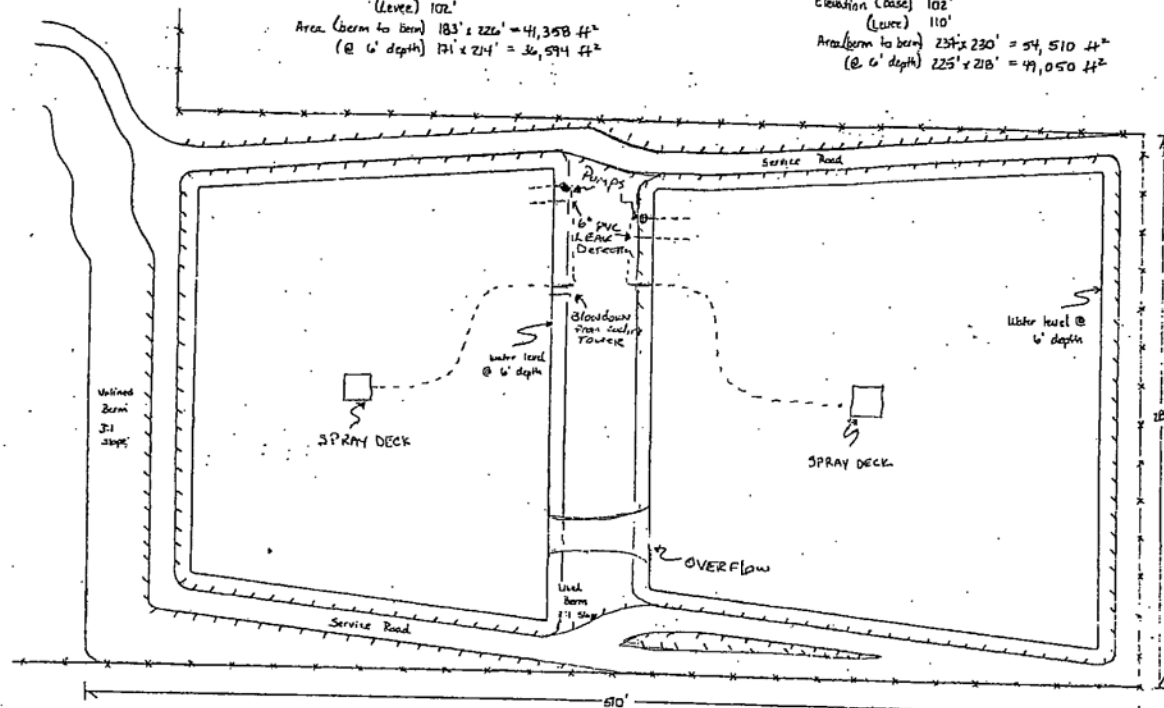
CONDENS EVAPORATION PONDS Plan View - Scale: 1" = 40'

WEST POND

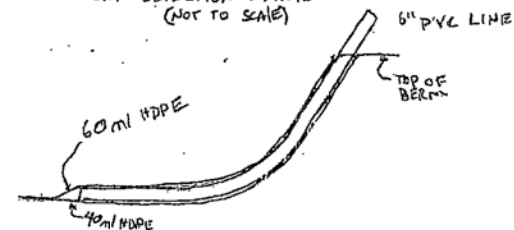
Elevation (Base) 94'
(Leve) 102'
Area (Berm to Berm) $183' \times 226' = 41,358 \text{ ft}^2$
(@ 6' depth) $171' \times 214' = 36,594 \text{ ft}^2$

EAST POND

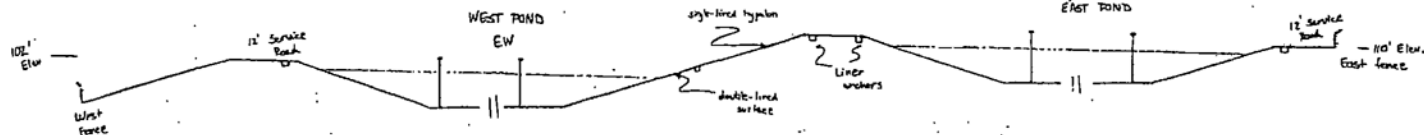
Elevation (Base) 102'
(Leve) 110'
Area (Berm to Berm) $234' \times 230' = 54,510 \text{ ft}^2$
(@ 6' depth) $225' \times 218' = 49,050 \text{ ft}^2$



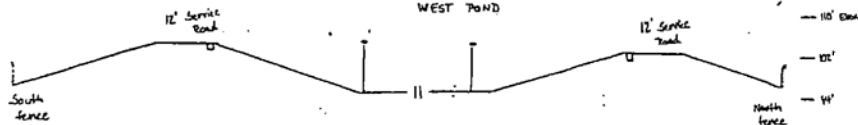
LEAK DETECTION DETAIL (Not to Scale)



EW CROSS-SECTION Scale: 1" = 24'



WS CROSS-SECTION WEST POND



NS CROSS-SECTION EAST POND



Standard Maintenance Procedure

Evaporative Pond Monthly Leak Detection

Refer to MSDS for the hazards and proper PPE when working with materials contained in this system.

1. Obtain a blank Monthly Pond Data form from the three ring binder titled "Pond Report" located in Compliance Coordinator's office.
2. At the East pond, use the PVC pole and gauge the 6" PVC sump pipe which is between the liners.
3. Using the mark on the gauge pole, see if the water level has increased from the previous month (remember the gauge pole is at an angle).
4. If there is any level increase from the previous month, install the submersible pump down the 6" PVC sump pipe to remove liquid from the sump into the pond. Record the Open Meter Reading on the Monthly Pond data form. Conduct a conductivity test on the water pumped from between the liners and note on the form. When pumping is complete, record the Closed Meter Reading on Monthly Pond Data form. Remove pump from the sump pipe and cap the sump pipe.
5. Perform a conductivity test on the discharge water from the East pond pump discharge through the recycle line.
6. At the West pond, use the PVC pole and gauge the 6" PVC sump pipe which is between the liners.
7. Using the mark on the gauge pole, see if the water level has increased from the previous month (remember the gauge pole is at an angle).
8. If there is any level increase from the previous month, install the submersible pump down the 6" PVC sump pipe to remove liquid from the sump into the pond. Record the Open Meter Reading on the Monthly Pond data form. Conduct a conductivity test on the water pumped from between the liners and note on the form. When pumping is complete, record the Closed Meter Reading on Monthly Pond Data form. Remove pump from the sump pipe and cap the sump pipe.
9. Conduct a conductivity test on the discharge water from the West pond pump discharge through the recycle line
10. File the report in the three ring binder labeled "Pond Report" located in the Compliance Coordinator's office.
11. Compare conductivity results with previous monthly test results. Report any significant changes to the Operations Supervisor for follow-up.
12. Operations Supervisor or Compliance Coordinator will report any suspected leaks to OCD in compliance with the SJGP Water Discharge Plan.
13. Record the blowdown meter reading on the Pond report form.

Submit 4 Copies
to Appropriate
District Office

State of New Mexico
Energy, Minerals and Natural Resources Department

Form C-134
Aug. 1, 1989

OIL CONSERVATION DIVISION

DISTRICT I
P.O. Box 1980, Hobbs, NM 88241-1980

P.O. Box 2088

Santa Fe, New Mexico 87504-2088

DISTRICT II
P.O. Drawer DD, Artesia, NM 88211-0719

Permit No. _____
(For Division Use Only)

DISTRICT III
1000 Rio Brazos Rd., Aztec, NM 87410

APPLICATION FOR EXCEPTION TO DIVISION ORDER R-8952
FOR PROTECTION OF MIGRATORY BIRDS Rule 8(b), Rule 105(b), Rule 312(h), Rule 313, or Rule 711(f)

Operator Name: Conoco Inc.

Operator Address: 61 County Rd 4900 (mailing address P.O. Box 217) Bloomfield, NM 87413

Lease or Facility Name San Juan Gas Processing Plant Location NW1/4 NW 1/4 14 29N 11W
Ut. Ltr. Sec. Twp. Rge

Size of pit or tank: West 183' X 226" East 234' X 230'

Operator requests exception from the requirement to screen, net or cover the pit or tank at the above-described facility.

☒ The pit or tank is not hazardous to migratory waterfowl. Describe completely the reason pit is non-hazardous.

The pit accepts only non-contact cooling tower water. The water used in the
cooling tower exchangers does not contact any process fluid and has no opportunity
for contamination.

1) If any oil or hydrocarbons should reach this facility give method and time required for removal:

Oil or hydrocarbons will be removed by using absorbent booms to soak up oil. A supply
of booms and absorbant materials are keep on hand at the facility at all times.

2) If any oil or hydrocarbons reach the above-described facility the operator is required to notify the
appropriate District Office of the OCD with 24 hours.

Operator proposes the following alternate protective measures: _____

RECEIVED
JUL 22 1996

OIL CON. DIV.
DIST. 7

CERTIFICATION BY OPERATOR: I hereby certify that the information given above is true and complete to the best of my knowledge and belief.

Signature Kathy A. Kanocz Title Environmental Engineer Date 07/16/96

Printed Name Kathy A. Kanocz Telephone No. (713) 293-4067

FOR OIL CONSERVATION DIVISION USE

Date Facility Inspected 7/23/96

Inspected by D-27

Approved by Denny Foust
Title Deputy oil and gas Inspector
Date 7/23/96

Appendix J
SPCC Plan
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SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN

San Juan Gas Plant

(Facility Name)

Onshore Gas Gathering and Processing Facility

(Type of Facility)

San Juan County

(Facility Location)

**ConocoPhillips Company
Americas Division
Gas Gathering and Processing
600 North Dairy Ashford
P.O. Box 2197
Houston, Texas 77079**

(Operator Name)

**61 County Road 4900
P.O. Box 217**

(Address)

Bloomfield, NM 87413

(Address)

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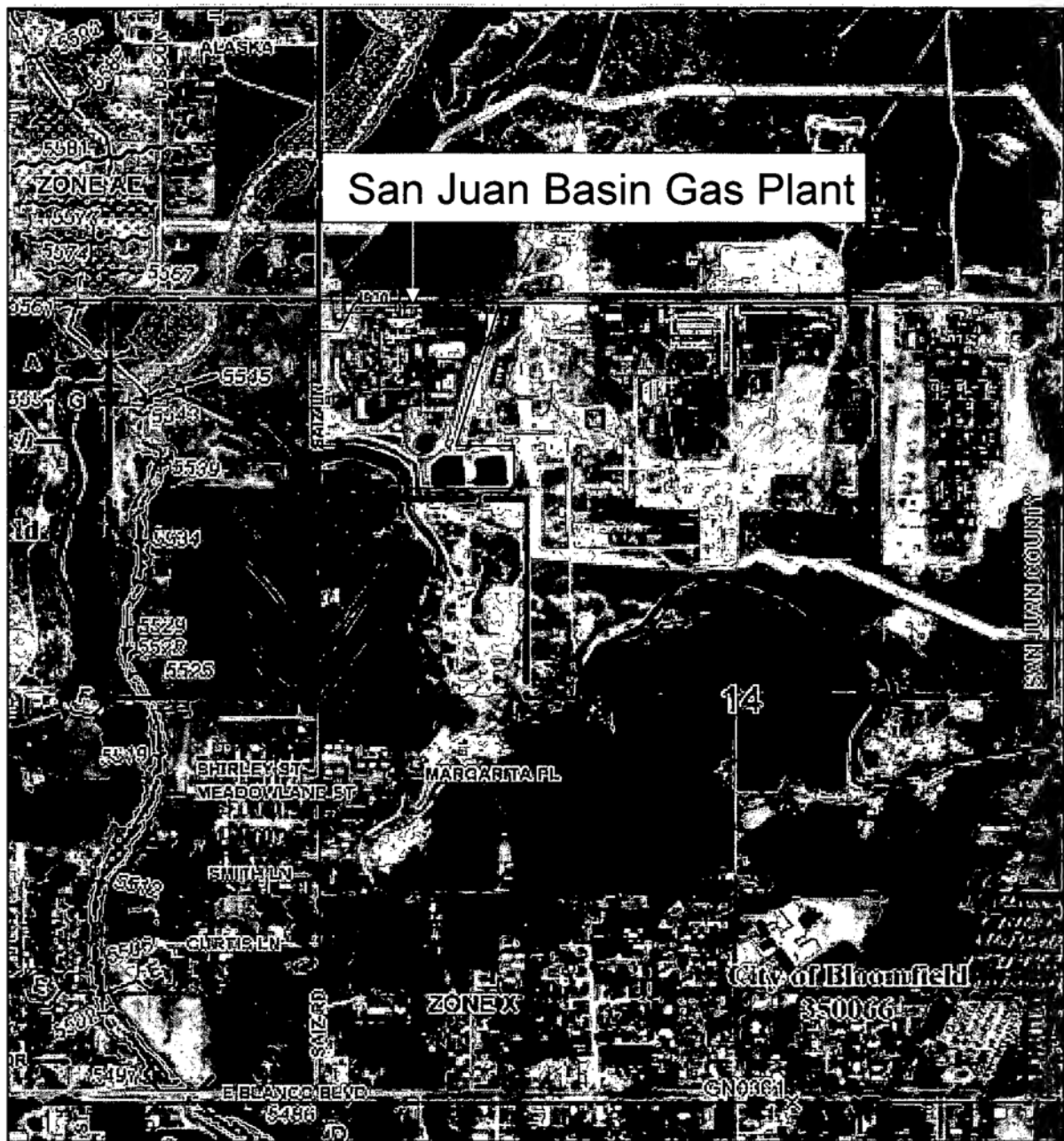
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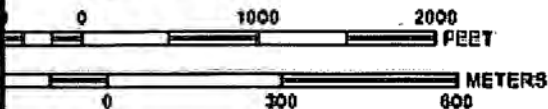
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- May 25, 2004 **Federal Register** (69 FR 29728); Notice Concerning Certain Issues Pertaining to the July 2002 Spill Prevention, Control, and Countermeasure (SPCC) Rule
- Letter to Daniel Gilligan, President, Petroleum Marketers Association of America from Marianne Larmont Horinko, Assistant Administrator, Environmental Protection Agency.



San Juan Basin Gas Plant

MAP SCALE 1" = 1000'



NATIONAL FLOOD INSURANCE PROGRAM

PANEL 1055F

FIRM

FLOOD INSURANCE RATE MAP
SAN JUAN COUNTY,
NEW MEXICO
AND INCORPORATED AREAS

PANEL 1055 OF 2750

(SEE MAP INDEX FOR FIRM PANEL LAYOUT)

CONTENTS

COMMUNITY	MADEP	DATE	STATUS
ALBUQUERQUE, CITY OF	200008	2000	F
SAN JUAN COUNTY	200004	2000	F

NOTES TO USER: The map number shown on this map is used when filing any claim for Community Rating System (CRS) points or when an insurance application for the subject area is filed.



MAP NUMBER
35048C1055F

EFFECTIVE DATE
AUGUST 5, 2010

Federal Emergency Management Agency

This is an official copy of a portion of the above referenced flood map. It was extracted using FIRM On-Line. This map does not reflect changes or amendments which may have been made subsequent to the data on the title block. For the latest product information about National Flood Insurance Program flood maps check the FEMA Flood Map Store at www.msc.fema.gov



Beverly J. Cox
Gas Activities
Gathering & Processing
PO Box 2197
Houston, TX 77252
505-486-2887

Certified Mail # 7008 1830 0001 4065 8551

June 16, 2011

State of New Mexico
Energy Minerals and Natural Resources
Oil Conservation Division
1220 South St Francis Drive
Santa Fe, NM 87505

**RE: Request for Discharge Plan (GW-035) Renewal
San Juan Basin Gas Plant
61 County Road 4900
Bloomfield, NM 87413**

Dear Sir / Madam,

The current Discharge Plan for the San Juan Basin Gas Plant expires on October 27, 2011. In accordance with 20.6.3.3109.H.(4) of the New Mexico Water Quality Control Commission Regulations, the San Juan Basin Gas Plant hereby requests the Discharge Plan approval be renewed. Enclosed for your review are two copies of the San Juan Basin Gas Plant's Discharge Plan and the \$100 filing fee.

As per 20.6.2.3108.C(2) NMAC, ConocoPhillips will submitted a public notice to the Farmington Daily Times in English and Spanish within 30 days of the Department deeming the application renewal administrative complete.

If you have any questions or require additional information, please contact me at 832-486-2887 or via email at beverly.j.cox@conocophillips.com.

Sincerely,

Beverly J. Cox

Enclosed – 2 copies of renewal application

cc: OCD – District III, Aztec, NM
San Juan Basin Gas Plant – Bloomfield, NM
Beverly Cox – ConocoPhillips – Houston, TX

San Juan Basin Gas Plant

61 Road 4900, Bloomfield, NM 87413

DTW ~34

DTW ~13 feet

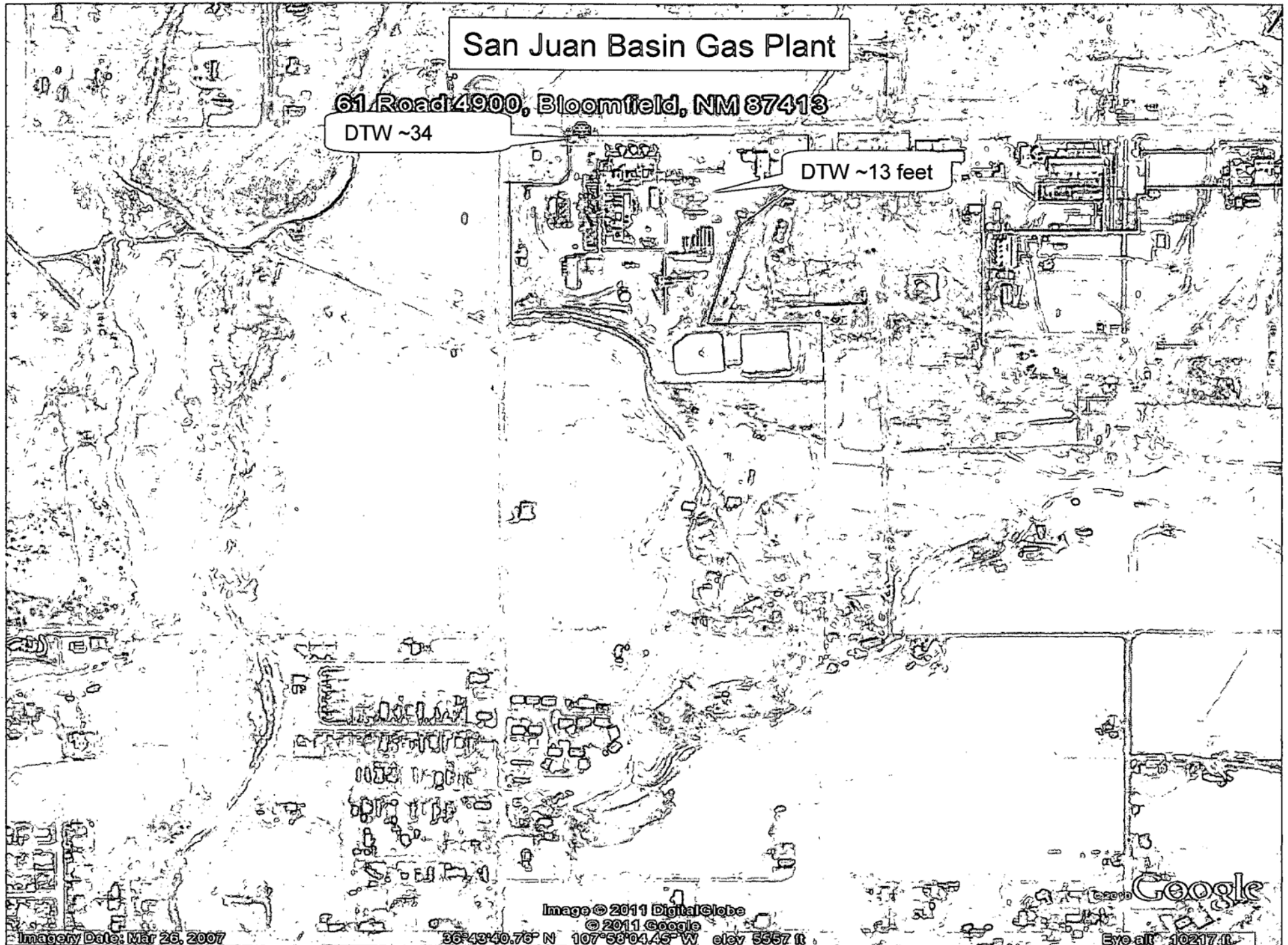


Image © 2011 DigitalGlobe

© 2011 Google

36°43'40.76" N 107°53'04.45" W elev 5557 ft

Google

Eye alt 10217 ft

Imagery Date: Mar 26, 2007

Appendix K

U.S. Department of the Interior Geological Survey/Topographic Map

The red dot marks the location of the San Juan Basin Gas Plant.

Appendix L

Hydrological Map of the San Juan Basin, New Mexico

The blue dot marks the approximate location of the San Juan Basin Gas Plant.



San Juan Gas Plant
P.O. Box 217
Bloomfield, NM 87413

Todd A. Kinard
Compliance Coordinator
505-632-4954 Fax 505-632-4930
Todd.A.Kinard@conocophillips.com

January 24, 2007

Mr. Wayne Price
Environmental Bureau
Energy, Minerals & Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

**Re: San Juan Gas Plant
Ground Water Discharge Permit (GW 035) Renewal**

Dear Mr. Price:

Enclosed you will find a signed copy of the Discharge Permit Approval Conditions and a renewal permit fee of \$4,000.

In a previous conversation with Beverly Cox dated Thursday, January 11, 2007, you had asked about the procedure for the evaporative pond monthly leak detection and a schematic of the underground lines. The information inquired upon is part of the book submitted for the discharge plan renewal. The evaporative pond monthly leak detection procedure is Appendix "I" and the schematic is Appendix "A". For your convenience, both Appendices are enclosed.

Should you have questions please do not hesitate to call me at 505-632-4954 or Beverly Cox at 505-324-6194.

Sincerely,

A handwritten signature in black ink, appearing to read "Todd Kinard", written over a horizontal line.

Todd Kinard

Enclosures

cc: Beverly Cox, Room 493
3401 E. 30th Street
Farmington, NM 87499



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

January 12, 2007

Mr. F.P. Micky Colomb
ConocoPhillips
San Juan Basin Gas Plant
P.O. Box 217
Bloomfield, New Mexico 87413

Re: Discharge Permit GW-035 Renewal
San Juan Basin Gas Plant

Dear Mr. Colomb:

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 ConocoPhillips (owner/operator) San Juan Basin Gas Plant GW-035 located in the NW/4 NW/4 of Section 14, Township 29 North, Range 11 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 Carl Chavez of my staff at (505-476-3491) or E-mail carlj.chavez@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/cc

Attachments-1

xc: OCD District Office

Mr. Micky Colomb
January 12, 2007
Page 2

**ATTACHMENT TO THE DISCHARGE PERMIT
CONOCOPHILLIPS SAN JUAN GAS PLANT (GW-035)
DISCHARGE PERMIT APPROVAL CONDITIONS
January 12, 2007**

Please remit a check for \$4,000.00 made payable to Water Quality Management Fund:

**Water Quality Management Fund
C/o: Oil Conservation Division
1220 South 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 \$4,000.00 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 October 27, 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 June 22, 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 shall 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. All pits or ponds shall be inspected monthly at a minimum for leaks. 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, where practicable, or otherwise rendered non-hazardous to wildlife, including migratory birds. ConocoPhillips received an Exception to Division Order R-8952 for Protection of Migratory Birds dated July 23, 1996. Discovery of dead wildlife and/or foul at facilities shall be immediately reported to the Federal Wildlife Service for investigation with a copy or verbal/written follow up notification to the OCD.

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 the owner/operator can demonstrate 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.

17. Storm Water: The owner/operator shall implement and maintain run-on and run-off 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: N/A

Mr. Micky Colomb
January 12, 2007
Page 7

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 transferor 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: ConocoPhillips, 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. **ConocoPhillips** 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

LANE AYERS

Company Representative- print name

Jane Ayers

Company Representative- signature

Title OPERATIONS MANAGER - SJGP

Date: 1/24/07

Appendix I

Evaporation Pond Information and Details

Evaporative Pond Details

Operation

Two evaporative ponds have been constructed according to the as-built drawing attached with 3:1 slopes on both sides of each levee, a maximum height of 10' and total lined surface area of 115,500 sq. ft. (2.65 acres). The tops of the levees are wide enough to provide a service road access around the ponds. Transference of water from one pond to the other is managed by manifold/valve operation.

The ponds are sized as follows:

	West Pond	East Pond
Base Elevation	94'	102'
Levee Elevation	102'	110'
Area (berm to berm)	183'x226' = 41,357 sq. ft.	234'x230' = 54,510 sq. ft.
Area (@ 6' depth)	171'x214' = 36,594 sq. ft.	225'x218' = 49,050 sq. ft.
Volume (@ 6' depth)	1.35 million gallons	2.20 million gallons
Sprinkling system	Spray deck	Spray deck

Each pond is equipped with a sprinkler system to enhance the yearly solar evaporation rate and a control system to shut down the pumps during high winds to control over spray.

The primary liner (top) in each pond is a 60 ml HDPE (High Density Poly Ethylene) liner and the secondary is a 40 ml HDPE. Between the primary and secondary liners is a Geonet, which allows for vapor space and a path for any water to travel to the corner of the pond where the leak detection system is located. On the west pond it is in the NE corner and on the east pond it is in the NW corner. A 6" PVC line is positioned between the primary and secondary liner from the bottom of the pond to the top of the pond for leak detection. On a monthly basis, the 6" PVC leak detection line is checked for water and documented. See "Evaporative Pond Monthly Leak Detection" procedure for proper testing and documentation requirements.

WEST POND

Elevation (Base) 94'
(Levee) 102'

Area (berm to berm) $183' \times 226' = 41,358 \text{ ft}^2$
(@ 6' depth) $171' \times 214' = 36,594 \text{ ft}^2$

EAST POND

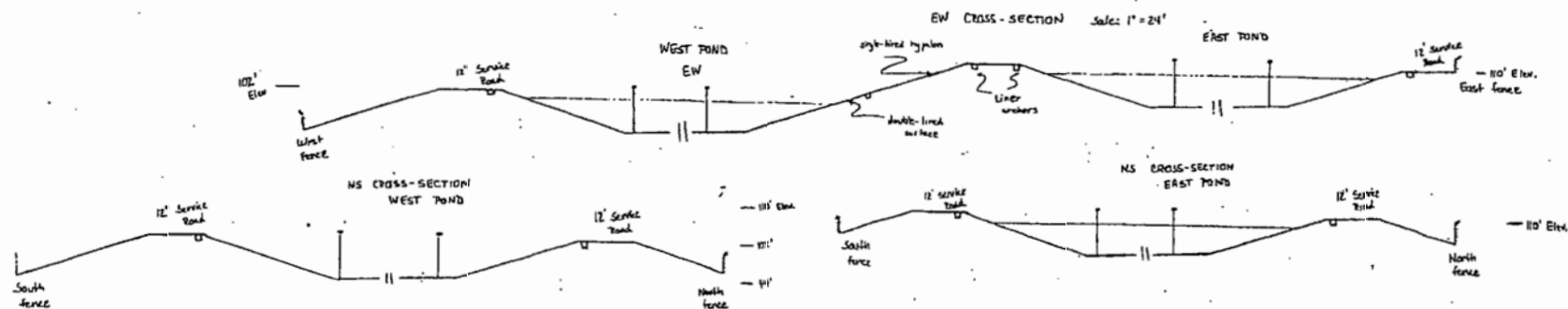
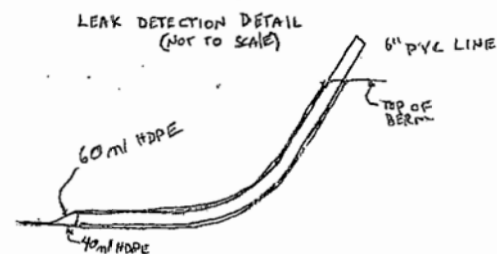
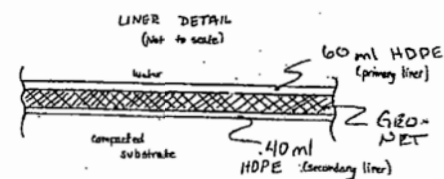
Elevation (Base) 102'
(Levee) 110'

Area (berm to berm) $234' \times 230' = 53,810 \text{ ft}^2$
(@ 6' depth) $225' \times 218' = 49,050 \text{ ft}^2$

The diagram is a hand-drawn site plan of two adjacent ponds, West Pond and East Pond. West Pond is on the left and East Pond is on the right. A central strip contains a 'Pumps' area with a '6" PVC 1/2" DIA. Discharge' pipe leading to a 'Blowdown from Safety Tower'. Below the pumps is a 'Live Berm 17' Slope'. Each pond has a 'SPRAY DECK' indicated by a dashed line and a square symbol. A 'Water Level @ 6' depth' is marked in West Pond. An 'Overflow' point is shown at the bottom of the central strip. 'Service Road' labels are present along the top and bottom edges. On the far left, a 'Vallined Berm 3:1 slope' is shown. On the far right, a 'Water Level @ 6' depth' is marked. A scale bar at the bottom indicates a distance of 50 feet.

Area (berm to berm) $183' \times 226' = 41,358 \text{ ft}^2$
(@ 6' depth) $171' \times 214' = 36,594 \text{ ft}^2$

Area (beam to beam) $237' \times 230' = 54,510 \text{ ft}^2$
(@ 6' depth) $225' \times 218' = 49,050 \text{ ft}^2$



Standard Maintenance Procedure Evaporative Pond Monthly Leak Detection

1. Obtain a blank Monthly Pond Data form from 3 ring binder titled "Pond Report" located in Process Foreman's office.
2. Obtain clean water sample bottles from lab for both ponds and both liner sumps.
3. Record the blow-down meter reading on the Pond report form.
4. Use the PVC gauge pole, gauge the water level between the liners on the east pond. If any level increase from the previous month is gauged, install the submersible pump down the 6" PVC sump pipe on the east pond. Record the Close Meter Reading on the Monthly Pond Data form before pumping begins. Pump the sump liquid into the pond and obtain a sample of the water for conductivity testing. When pumping is complete, record the Open meter reading on Monthly Pond Data form. Remove pump from the sump pipe and cap the sump pipe.
5. Obtain sample of water from the east pond.
6. Use the PVC gauge pole, gauge the water level between the liners on the west pond. If any level increase from the previous month is gauged, install the submersible pump down the 6" PVC sump pipe on the west pond. Record the Close Meter Reading on the Monthly Pond Data form before pumping begins. Pump the sump liquid into the pond and obtain a sample of the water for conductivity testing. When pumping is complete, record the Open meter reading on Monthly Pond Data form. Remove pump from the sump pipe and cap the sump pipe.
7. Obtain sample of water from the west pond.
8. In the lab, test each sample's conductivity and record on Monthly Pond Data form.
9. Sign the Monthly Pond Data form.
10. File the report in the 3 ring binder labeled "Pond Report" located in the Process Foreman's office.
11. Compare conductivity results with previous monthly test results. Report any significant changes to the Process Foreman for follow-up.
12. Process Foreman will report any suspected leaks to OCD in compliance with our SJGP Water Discharge Plan.

DISTRICT I
P.O. Box 1980, Hobbs, NM 88241-1980

DISTRICT II
P.O. Drawer DD, Artesia, NM 88211-0719

DISTRICT III
1000 Rio Brazos Rd., Aztec, NM 87410

OIL CONSERVATION DIVISION

P.O. Box 2088
Santa Fe, New Mexico 87504-2088

Permit No. _____
(For Division Use Only)

APPLICATION FOR EXCEPTION TO DIVISION ORDER R-8952 FOR PROTECTION OF MIGRATORY BIRDS Rule 8(b), Rule 105(b), Rule 312(h), Rule 313, or Rule 711(f)

Operator Name: Conoco Inc.

Operator Address: 61 County Rd 4900 (mailing address P.O. Box 217) Bloomfield, NM 87413

Lease or Facility Name San Juan Gas Processing Plant Location NW 1/4 NW 1/4 14 29N 11W
Ut. Ltr. Sec. Twp. Rge

Size of pit or tank: West 183' X 226' East 234' X 230'

Operator requests exception from the requirement to screen, net or cover the pit or tank at the above-described facility.

☒ The pit or tank is not hazardous to migratory waterfowl. Describe completely the reason pit is non-hazardous.

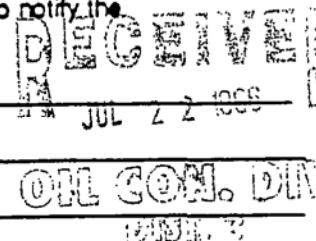
The pit accepts only non-contact cooling tower water. The water used in the
cooling tower exchangers does not contact any process fluid and has no opportunity
for contamination.

1) If any oil or hydrocarbons should reach this facility give method and time required for removal:

Oil or hydrocarbons will be removed by using absorbent booms to soak up oil. A supply
of booms and absorbant materials are keep on hand at the facility at all times.

2) If any oil or hydrocarbons reach the above-described facility the operator is required to notify the
appropriate District Office of the OCD with 24 hours.

Operator proposes the following alternate protective measures: _____



CERTIFICATION BY OPERATOR: I hereby certify that the information given above is true and complete to the best of my knowledge and belief.

Signature Kathy A. Kanocz Title Environmental Engineer Date 07/16/96

Printed Name Kathy A. Kanocz Telephone No. (713) 293-4067

FOR OIL CONSERVATION DIVISION USE

Date Facility Inspected 7/23/96

Inspected by D-27

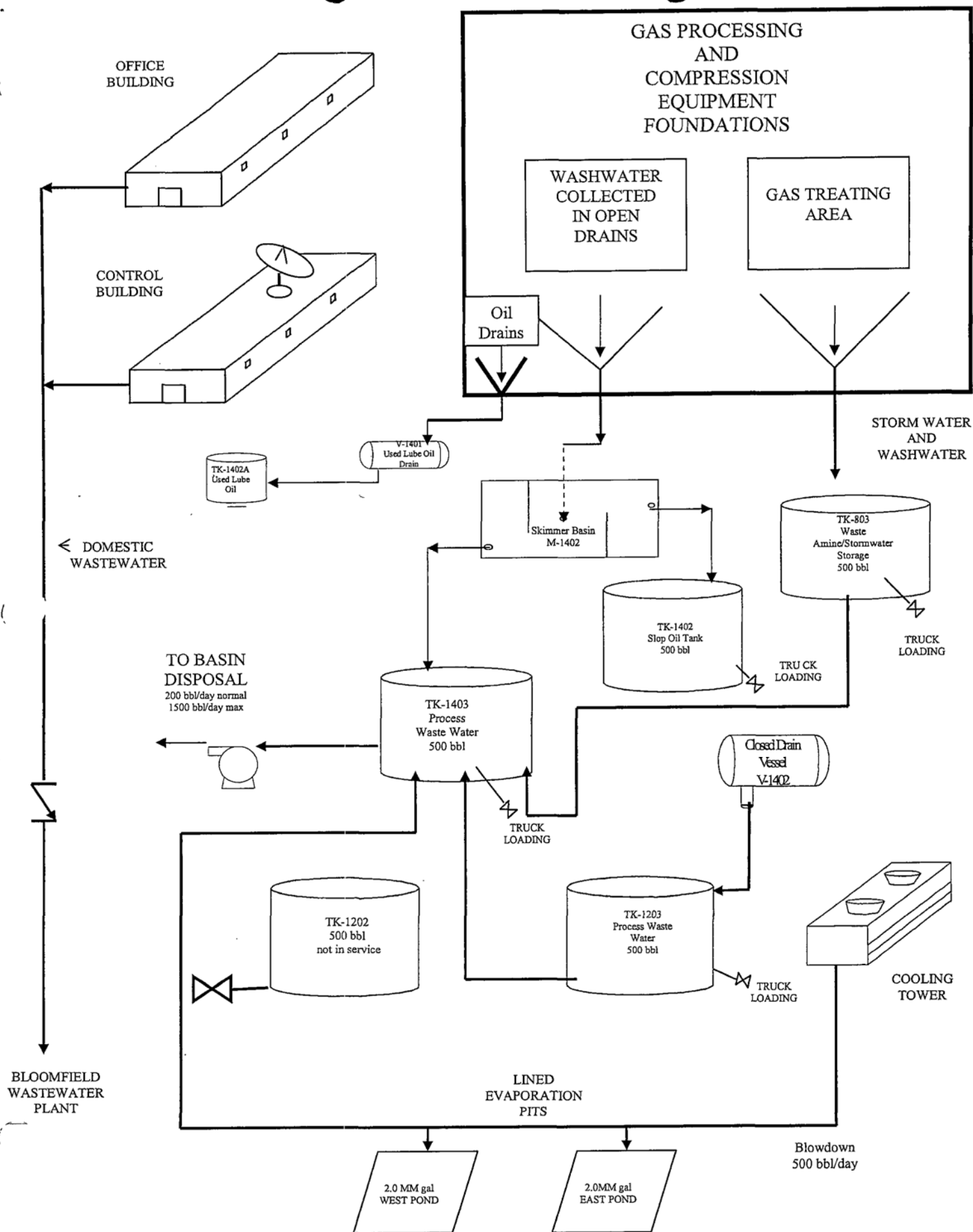
Approved by Denny Foust

Title Deputy oil and Gas Inspector

Date 7/23/96

Appendix A

**Wastewater Collection System
Schematic Diagram**

SCHEMATIC DIAGRAM WASTEWATER DRAINAGE SYSTEM
SAN JUAN BASIN GAS PLANT



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

January 12, 2007

Mr. F.P. Micky Colomb
ConocoPhillips
San Juan Basin Gas Plant
P.O. Box 217
Bloomfield, New Mexico 87413

Re: Discharge Permit GW-035 Renewal
San Juan Basin Gas Plant

Dear Mr. Colomb:

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 ConocoPhillips (owner/operator) San Juan Basin Gas Plant GW-035 located in the NW/4 NW/4 of Section 14, Township 29 North, Range 11 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 Carl Chavez of my staff at (505-476-3491) or E-mail carlj.chavez@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/cc

Attachments-1

xc: OCD District Office

**ATTACHMENT TO THE DISCHARGE PERMIT
CONOCOPHILLIPS SAN JUAN GAS PLANT (GW-035)
DISCHARGE PERMIT APPROVAL CONDITIONS
January 12, 2007**

Please remit a check for \$4,000.00 made payable to Water Quality Management Fund:

**Water Quality Management Fund
C/o: Oil Conservation Division
1220 South 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 \$4,000.00 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 October 27, 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 June 22, 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 shall 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. All pits or ponds shall be inspected monthly at a minimum for leaks. 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, where practicable, or otherwise rendered non-hazardous to wildlife, including migratory birds. ConocoPhillips received an Exception to Division Order R-8952 for Protection of Migratory Birds dated July 23, 1996. Discovery of dead wildlife and/or foul at facilities shall be immediately reported to the Federal Wildlife Service for investigation with a copy or verbal/written follow up notification to the OCD.

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 the owner/operator can demonstrate 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.

17. Storm Water: The owner/operator shall implement and maintain run-on and run-off 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: N/A

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 transferor 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: ConocoPhillips, 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. **ConocoPhillips** 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:_____



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

November 17, 2006

Mr. F.P. Micky Colomb
Process Foreman
San Juan Basin Gas Plant
P.O. Box 217
Bloomfield, New Mexico 87413

Re: Discharge Permit GW-035 Renewal
San Juan Basin Gas Plant

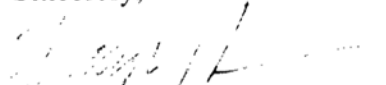
Dear Mr. Colomb:

Pursuant to Water Quality Control Commission (WQCC) Regulations 20.6.2.3104 - 20.6.2.3114 NMAC, the Oil Conservation Division (OCD) hereby **approves the discharge permit** for the ConocoPhillips (owner/operator) San Juan Basin Gas Plant GW-035 located in the NW/4 NW/4 of Section 14, Township 29 North, Range 11 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 Carl Chavez of my staff at (505-476-3491) or E-mail carlj.chavez@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/cc
Attachments-1
xc: -OCD District Office

Mr. Micky Colomb
November 17, 2006
Page 2

**ATTACHMENT TO THE DISCHARGE PERMIT
CONOCOPHILLIPS SAN JUAN GAS PLANT (GW-035)
DISCHARGE PERMIT APPROVAL CONDITIONS
November 17, 2006**

Please remit a check for \$4,000.00 made payable to Water Quality Management Fund:

**Water Quality Management Fund
C/o: Oil Conservation Division
1220 South 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 \$4,000.00 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 October 27, 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 June 22, 2006 discharge permit 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 20.6.2.3109.G NMAC addresses possible future modifications of a permit. Pursuant to WQCC Regulation 20.6.2.3107.C NMAC, 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. Pursuant to WQCC Regulation 20.6.2.3109.E NMAC, 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.

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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 shall 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 the owner/operator can demonstrate 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.

17. Storm Water: The owner/operator shall implement and maintain run-on and run-off 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:

- A. **December 17, 2001 Conoco Inc. Letter:** Condition 8 (annual testing of below grade tanks/sumps); Condition 9 (5-yr. schedule for testing underground process/wastewater lines); and 14 (monthly pond inspection for leaks).
- B. **April 17, 2006 Conoco Inc. E-mail:** Classification as a RCRA non-exempt, non-hazardous waste and disposal of spent sand blast media is approved and carried over to this permit. Since this waste is not listed in the discharge plan renewal, it requires an OCD approval for disposal on a case-by-case basis.

- C. **July 20, 2005 Conoco Inc. E-mail:** Condition #8 ("The test result will be retained on site for a period of 5 years"); Condition #17 ("Any leaks found must be reported to NMOCD Santa Fe Environmental Bureau and the appropriate District office within 24 hours of discovery"), and attached evaporation pond leak detection procedure(s).

21. Transfer of Discharge Permit: The owner/operator shall notify the OCD prior to any transfer of ownership, control or possession of a facility with an approved discharge permit. The purchaser shall submit a written commitment to comply with the terms and conditions of the previously approved discharge permit and shall seek OCD approval prior to transfer.

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: CONOCOPHILLIPS, by the officer whose signature appears below, accepts this permit and agrees to comply with all submitted commitments, including these terms and conditions contained herein. **CONOCOPHILLIPS** 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: **CONOCOPHILLIPS**

Company Representative- print name

Company Representative- signature

Title_____

Date_____



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop

Cabinet Secretary

Mark E. Fesmire, P.E.

Director

Oil Conservation Division

January 9, 2007

Mr. F. P. Mickey Colomb
Process Foreman
ConocoPhillips Company
San Juan Basin Gas Plant
P.O. Box 217
Bloomfield, New Mexico 87413

**Re: Hydrostatic Test Water Discharge - Temporary Permission
ConocoPhillips San Juan Basin Gas Plant GW-035
Bloomfield, New Mexico**

Dear Mr. Colomb:

The New Mexico Oil Conservation Division (OCD) has received ConocoPhillips' request, dated December 27, 2006, for temporary permission to generate approximately 8,000 gallons of wastewater from a hydrostatic test of approximately 340 feet of new pipeline within the ConocoPhillips San Juan Basin Gas Plant property boundary in Bloomfield, New Mexico.

Based on the information provided in the request, **temporary permission is hereby granted** for the alternative use/disposal of the hydrostatic test water generated from the new pipeline test with the following understandings and conditions:

1. approximately 340 feet of new pipeline, located in the NW ¼ of the NW ¼ of Section 14, Township 29 North, Range 11 West, will be tested;
2. the source of the hydrostatic test water will be obtained from a municipal/public water supply;
3. approximately 8,000 gallons of hydrostatic test water generated from the test will be collected at the San Juan Basin Gas Plant and used as cooling water in the cooling tower;
4. no hydrostatic test water generated from the test will be discharged to groundwater or off-site;
5. a letter must be provided to the OCD within 10 days of the hydrostatic test event stating the volume and method of disposal of the hydrostatic test water generated from the test; and
6. ConocoPhillips shall report all unauthorized discharges, spills, leaks and releases of hydrostatic test water and conduct corrective action pursuant to WQCC Regulation

Mr. Colomb
January 9, 2007
Page 2 of 2

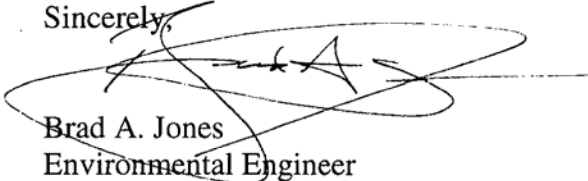
20.5.12.1203 NMAC and OCD Rule 116 (19.15.3.116 NMAC). ConocoPhillips shall notify both the OCD District Office and the Santa Fe Office within 24 hours and file a written report within 15 days.

It is understood that the hydrostatic test will occur sometime during the period of January 11, 2007 through January 22, 2007. **This temporary permission will expire in 120 days.**

This approval does not relieve ConocoPhillips of responsibility should its operation result in pollution of surface water, ground water, or the environment. In addition, OCD approval does not relieve ConocoPhillips of responsibility for compliance with other federal, state or local regulations.

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3487 or brad.a.jones@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,



Brad A. Jones
Environmental Engineer

BAJ/baj

cc: OCD District III Office, Aztec, NM



San Juan Gas Plant
P.O. Box 217
Bloomfield, NM 87413

December 27, 2006

Brad Jones
New Mexico Energy, Minerals, and Natural Resources Department
Oil Conservation Division
Environmental Bureau
1220 South St Francis Drive
Santa Fe, NM 87505

Subject: Temporary Permission to Discharge

Dear Mr. Jones,

As you suggested, San Juan Basin Gas Plant (SJBGP) operated by ConocoPhillips Company by this letter submits this notice of intent to discharge in accordance with Sec. 1201, 20.6.2 NMAC; and seeks temporary permission to discharge as described herein. The fee of \$150 is attached.

The proposed action is a hydrostatic test of new pipeline located at the plant site, using municipal water meeting WQCC groundwater standards.

A map, attached, illustrates the location of the pipeline to be tested.

The proposed discharger is

ConocoPhillips Company
San Juan Basin Gas Plant
PO Box 217
Bloomfield, NM 87413

Discharge Permit # GW-035

The water will be captured at the above plant, located in the NW/4 of the NW/4 of Sec 14, T29 N, R 11 W. The facility is approximately 1 mile north of Bloomfield, NM.

The water will be captured at the plant and used as cooling water in the cooling tower. No discharge to groundwater is expected to occur.

2006 DEC 28 PM 12 45

The pipe to be tested is approximately 340 feet in length. The approximate volume of water to be discharged is 8000 gallons. The water is expected to be of WQCC quality, as the pipe is new and the supply is municipal drinking water.

As the location of the pipe to be tested and the location of discharge is the property of SJBG, and no alternate discharge locations are contemplated, no notification to landowners is necessary.

SJBG understands that a follow-up letter stating the volume and method of disposal will be required subsequent to the test.

Your attention is appreciated; SJBG proposes to conduct this test the second week of January, 2007.

I certify that the above is true and correct to my knowledge and belief based on reasonable inquiry.

Sincerely,



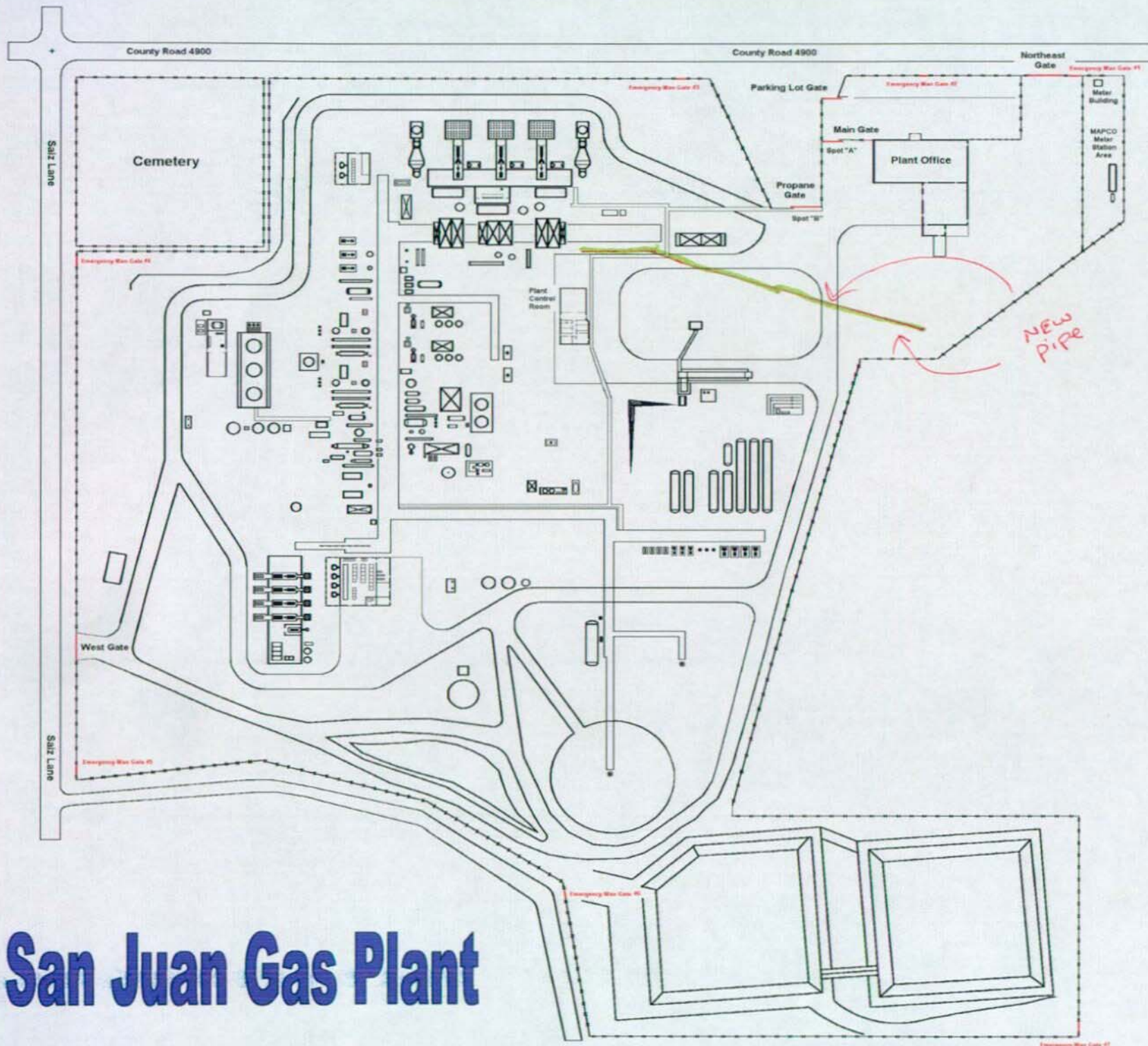
F. P. Micky Colomb
Process Foreman
ConocoPhillips
San Juan Basin Gas Plant

Attachments:

SJGP plot plan with new pipe
Check for \$150.00

cc: file

Sam Cudney e-mail: sam@enservice.com



San Juan Gas Plant

I hereby acknowledge receipt of check No. dated 12/4/06

from Concord Phillips

Submitted by: Lawrence Panoio Date: 1/30/07

Submitted to ASD by: _____ Date: 1/30/07

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 _____

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check/cash [redacted] dated 10/27/06

for the amount of \$ 100.00

for Conoco Phillips

for GW-035

Submitted by Lawrence Romero Date 11/1/06

Submitted to ASD by Lawrence Romero Date 11/1/06

Received in ASD by _____ Date _____

Filing Fee _____ New Facility _____ Renewal ☒

Modification _____ Other _____

Organization Code 52107 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

DEBRA NUTTALL
CONOCOPHILLIPS
P.O. BOX 217
BLOOMFIELD NM 87413

DATE Oct 27, 2006 56-1551/441

PAY TO THE ORDER OF Water Quality Management Fund \$ 100.00
One hundred and 00/100 DOLLARS

JPMorganChase
JPMorgan Chase Bank, N.A.
Columbus, OH

Valid Up To 5000 Dollars

MEMO SJGP GWDP (GW-035) Debra S. Nuttall

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 8/07/01
8/20/01
or cash received on _____ in the amount of \$ 4000⁰⁰
from CONOCO INC.

for SAN JUAN GAS PLANT

6W-035

Submitted by: WAYNE PRICE Data: 8/20/01

Submitted to ASD by: [Signature] Data: 8/20/01

Received in ASD by: _____ Data: _____

Filing Fee _____ New Facility _____ Renewal ☒

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2002

To be deposited in the Water Quality Management Fund.

Full Payment ☒ or Annual Increment _____



CONOCO INC
PONCA CITY, OK 74602

No. [REDACTED]

62-21
311

To: Citibank Delaware
New Castle, DE 19720

AUGUST 7, 2001

*** VOID AFTER 90 DAYS ***

Vendor Code: 223283R01

Exactly *****\$4,000.00**

Pay
To the
Order
Of

|||||
NMED WATER QUALITY MANAGEMENT
ATTN: MR. ROGER ANDERSON
OIL CONSERVATION DIVISION
1220 S SAINT FRANCIS DR
SANTA FE NM 87505-4000

S. Z. Conelmin

Authorized Signature

Price, Wayne, EMNRD

From: Price, Wayne, EMNRD
Sent: Tuesday, April 18, 2006 8:57 AM
To: 'Colomb, F.P. Micky'
Cc: Ayers, G. Lane; Reese, Kevin E.; Chandler, Byron L.
Subject: RE: Minor Modification to the San Juan Basin Gas Plant's Discharge Plan GW-035

Approved!

Please include this approval in your permit file.

Vendor Code: 223283R01 Company: 001 - CONOCO INC Check No.: 04581051

S H	Voucher Reference	Invoice Date	Invoice Number	1099 CD	Gross Amount	ADJ CD	Adjustment Amount	Discount Amount	Net Amount
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VENDOR NAME: NMED WATER QUALITY MANAGEMENT

IN CASE OF QUESTIONS ABOUT THE FOLLOWING INVOICES, PLEASE CALL (505) 632-4900

07331660C218S002 20010701 072601

4,000.00

.00

.00

4,000.00

*SAN JUAN GAS PLANT DISCHARGE PLAN RENEWAL

* * * INQUIRIES ON ABOVE INVOICES SHOULD BE DIRECTED TO PHONE NO. LISTED ABOVE

TOTAL NET AMOUNT

\$4,000.00

1099 CODES - R=RENTAL L=ROYALTIES P=PERSONAL SERVICES M=MEDICAL I=INTEREST F=FOREIGN VDR PYMT N=NET PROFIT
 D=PERMIT/DAMAGE G=PRIZES/AWARDS C=BWP REFUND/INTEREST B=BWP REFUND/MISC A=NON-REPORTABLE TYPES
 ADJ CODES - Q=WRONG QUANTITY P=WRONG PRICE C=WRONG CALCULATION M=MULTIPLE ERRORS F=CORRECTED FREIGHT CHARGES
 D=CORRECTED DISCOUNT T=TAX REMOVAL B=BACKUP WITHHOLDING OF 31% PER IRS REGULATIONS O=OTHER

Price, Wayne, EMNRD

From: Price, Wayne, EMNRD
To: Colomb, F.P. Micky
Cc: Ayers, G. Lane; Reese, Kevin E.
Subject: RE: GW-035 Discharge plan for The San Juan Basin Gas Plant
Attachments:

Sent: Wed 7/20/2005 4:53 PM

OCD hereby approves of the minor changes and will attached this document to the discharge Plan.

Wayne Price-Senior Environmental Engr.
Oil Conservation Division
1220 S. Saint Francis
Santa Fe, NM 87505
E-mail wayne.price@state.nm.us
Tele: 505-476-3487
Fax: 505-4763462

From: Colomb, F.P. Micky [mailto:F.P.Micky.Colomb@conocophillips.com]
Sent: Wed 7/20/2005 12:29 PM
To: Price, Wayne, EMNRD
Cc: Ayers, G. Lane; Reese, Kevin E.
Subject: GW-035 Discharge plan for The San Juan Basin Gas Plant

Mr. Price,

This is a request to revise the Discharge Plan Approval Conditions for GW-035 of the San Juan Basin Gas Plant.

Condition #8 revised to read "The test result will be retained on site for a period of 5 years."

Condition #17 revised to read "Any leaks found must be reported to NMOCD Santa Fe Environmental Bureau and the appropriate District office within 24 hours of discovery."

Attached is the procedure used for our Evaporation Pond leak detection.

Thank you,

F. P. Micky Colomb

San Juan Basin Gas Plant


(505) 632-4905



You replied on 7/20/2005 4:32 PM.

Attachments can contain viruses that may harm your computer. Attachments may not display correctly.

Price, Wayne, EMNRD

From: Colomb, F.P. Micky [F.P.Micky.Colomb@conocophillips.com]
To: Price, Wayne, EMNRD
Cc: Ayers, G. Lane; Reese, Kevin E.
Subject: GW-035 Discharge plan for The San Juan Basin Gas Plant
Attachments:  [Evap pond leak detection.doc\(40KB\)](#)

Sent: Wed 7/20/2005 12:29 PM

Mr. Price,

This is a request to revise the Discharge Plan Approval Conditions for GW-035 of the San Juan Basin Gas Plant.

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Attached is the procedure used for our Evaporation Pond leak detection.

Thank you,

F. P. Micky Colomb

San Juan Basin Gas Plant

(505) 632-4905

Standard Maintenance Procedure Evaporative Pond Monthly Leak Detection

1. Obtain a blank Monthly Pond Data form from 3 ring binder titled "Pond Report" located in Process Foreman's office.
2. Obtain clean water sample bottles from lab for both ponds and both liner sumps.
3. Record the blow-down meter reading on the Pond report form.
4. Use the PVC gauge pole, gauge the water level between the liners on the east pond. If any level increase from the previous month is gauged, install the submersible pump down the 6" PVC sump pipe on the east pond. Record the Close Meter Reading on the Monthly Pond Data form before pumping begins. Pump the sump liquid into the pond and obtain a sample of the water for conductivity testing. When pumping is complete, record the Open meter reading on Monthly Pond Data form. Remove pump from the sump pipe and cap the sump pipe.
5. Obtain sample of water from the east pond.
6. Use the PVC gauge pole, gauge the water level between the liners on the west pond. If any level increase from the previous month is gauged, install the submersible pump down the 6" PVC sump pipe on the west pond. Record the Close Meter Reading on the Monthly Pond Data form before pumping begins. Pump the sump liquid into the pond and obtain a sample of the water for conductivity testing. When pumping is complete, record the Open meter reading on Monthly Pond Data form. Remove pump from the sump pipe and cap the sump pipe.
7. Obtain sample of water from the west pond.
8. In the lab, test each sample's conductivity and record on Monthly Pond Data form.
9. Sign the Monthly Pond Data form.
10. File the report in the 3 ring binder labeled "Pond Report" located in the Process Foreman's office.
11. Compare conductivity results with previous monthly test results. Report any significant changes to the Process Foreman for follow-up.
12. Process Foreman will report any suspected leaks to OCD in compliance with our SJGP Water Discharge Plan.

RECEIVED
DEC 26 2001
Environmental Bureau
Oil Conservation Division

ATTACHMENT TO THE DISCHARGE PLAN GW-035 APPROVAL
Conoco, Inc., San Juan Gas Plant
DISCHARGE PLAN APPROVAL CONDITIONS
October 26, 2001

1. Payment of Discharge Plan Fees: The \$100.00 filing fee and \$4000.00 flat fee has been received by the OCD.
2. Commitments: Conoco, Inc. will abide by all commitments submitted in the discharge plan renewal application dated June 25, 2001 including attachments and subsequent submittal dated August 02, 2001 including attachments, and these conditions for approval.
3. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums should be stored on their sides with the bungs in place and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets must also be stored on an impermeable pad with curbing.
4. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
5. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new facilities or modifications to existing facilities must place the tank on an impermeable type pad within the berm.
6. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
7. Labeling: All tanks, drums, and other containers should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill, or ignite.

8. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must be tested to demonstrate their mechanical integrity no later than December 15, 2001 and every year from tested date, thereafter. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing. The test results will be submitted to OCD annually by December 31 of each year.
9. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity no later than December 15, 2001 and every 5 years, from tested date, thereafter. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing. The test results will be submitted to OCD by December 31, 2001.
10. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be approved for construction and/or operation unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.
11. Housekeeping: All systems designed for spill collection/prevention, and leak detection will be inspected daily to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices will be emptied of fluids within 48 hours of discovery. A record of inspection will be retained on site for a period of five years.
12. Spill Reporting: All spills/releases shall be reported pursuant to OCD Rule 116. and WQCC 1203. to the OCD Aztec District Office.
13. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.


Rule 712 Waste: Pursuant to Rule 712, disposal of certain non-domestic waste is allowed at solid waste facilities permitted by the New Mexico Environment Department as long as the waste stream is identified in the discharge plan, and existing process knowledge of the waste stream does not change without notification to the Oil Conservation Division. The following waste is hereby approved:

1. Solid Waste (Trash/Refuse).
 2. Cooling water evaporation pond sediment generated on-site.
 3. Activated Alumina generated from the EPBC dryer system.
 4. Used Sulfa-clean.
 5. Molecular Seive.
 6. Solids and sludges listed in discharge plan section VIII.C.2.B. must be approved on a case-by-case basis.
-
14. OCD Inspections: Additional requirements may be placed on the facility based upon results from OCD inspections. As a result of OCD's inspection on August 02, 2001 Conoco Inc. shall investigate the evaporation ponds primary liners to determine if they are leaking. Please report the results of your findings by December 31, 2001.
 15. Storm Water Plan: Conoco, Inc. shall maintain stormwater runoff controls as submitted in the discharge plan item X. C. "Procedures for Containment of Precipitation and Runoff". As a result of Conoco's operations if any water contaminant that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 is discharged in any stormwater run-off then Conoco shall notify the OCD within 24 hours, modify the plan within 15 days and submit for OCD approval. Conoco shall also take immediate corrective actions pursuant to Item 12 of these conditions.
 16. East and West Double-Lined Waste Water Evaporation Ponds: A minimum freeboard will be maintained in the ponds so that no over topping of wastewater occurs. Any repairs or modifications to the pond liners and/or leak detection systems must receive prior OCD approval. Leaks and releases shall be reported pursuant to Item 12. (Spill Reporting) of these conditions.
 17. Leak Detection Monitor Wells: All leak detection monitor wells must be inspected for fluids monthly. Records will be maintained to include quantity of fluid measured, date of inspection, and name of inspector. Any fluids found must be reported to the NMOCD Santa Fe Environmental Bureau and the appropriate District office within 24 hours of discovery.

18. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.
19. Closure: The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
20. Certification: **Conoco Inc.** by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. **Conoco Inc.** further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Conditions accepted by: **Conoco Inc.**

G. LANE AYERS
Company Representative- print name

 Date 12-14-01
Company Representative- Sign

Title OPERATION MANAGER
SAN JUAN BASIN GAS PLANT



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

Jennifer A. Salisbury

Cabinet Secretary

Lori Wrotenbery

Director

Oil Conservation Division

October 26, 2001

CERTIFIED MAIL

RETURN RECEIPT NO. 5357 7416

Mr. Lane Ayers
Conoco Inc.
P.O. Box 217
Bloomfield, NM 87413

RE: Discharge Plan Renewal GW-035
Conoco Inc.
San Juan Gas Plant
San Juan County, New Mexico

Dear Mr. Ayers:

The groundwater discharge plan renewal GW-035 for the Conoco Inc. San Juan Gas Plant located in the NW/4 NW/4 of Section 14, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. 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 days of receipt of this letter.**

The original discharge plan application was submitted on July 10, 1986 and approved on October 27, 1986 with an expiration date of October 27, 1991. The discharge plan renewal application dated June 25, 2001 including attachments and subsequent submittal dated August 02, 2001 submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations also includes all earlier applications and all conditions later placed on those approvals.

The discharge plan is renewed pursuant to Section 3109.C. Please note Section 3109.G, which provides for possible future amendment of the plan. Please be advised that approval of this plan does not relieve Conoco Inc. of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does it relieve Conoco Inc. of its responsibility to comply with any other governmental authority's rules and regulations.

Please be advised that all exposed pits, including lined pits and open top tanks (exceeding 16 feet in diameter) shall be screened, netted, or otherwise rendered nonhazardous to wildlife including migratory birds.

Please note that Section 3104. of the regulations requires that "when a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C., Conoco Inc. is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3109.H.4., this approval is for a period of five years. **This approval will expire October 27, 2006** and an application for renewal should be submitted in ample time before that date. Pursuant to Section 3106.F. of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved.

The discharge plan application for the Conoco, Inc., San Juan Gas Plant is subject to the WQCC Regulation 3114. Every facility submitting a discharge plan will be assessed a fee equal to the filing fee of \$ 100.00 plus flat fee of \$ 4000.00 for gas processing plants. The flat fee may be paid in a single payment due on the date of the discharge plan approval or in five equal installments over the expected duration of the discharge plan. Installment payments shall be remitted yearly, with the first installment due on the date of the discharge plan approval and subsequent installments due on this date of each calendar year.

**Please make all checks payable to: Water Quality Management Fund
C/o: Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505.**

If you have any questions, please contact Wayne Price of my staff at (505-476-3487). On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge plan review.

Sincerely,



Roger C. Anderson
Environmental Bureau Chief

RCA/lwp
Attachment-1
xc: OCD Aztec Office

ATTACHMENT TO THE DISCHARGE PLAN GW-035 APPROVAL
Conoco, Inc., San Juan Gas Plant
DISCHARGE PLAN APPROVAL CONDITIONS
October 26, 2001

1. Payment of Discharge Plan Fees: The \$100.00 filing fee and \$4000.00 flat fee has been received by the OCD.
2. Commitments: Conoco, Inc. will abide by all commitments submitted in the discharge plan renewal application dated June 25, 2001 including attachments and subsequent submittal dated August 02, 2001 including attachments, and these conditions for approval.
3. Drum Storage: All drums containing materials other than fresh water must be stored on an impermeable pad with curbing. All empty drums should be stored on their sides with the bungs in place and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets must also be stored on an impermeable pad with curbing.
4. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.
5. Above Ground Tanks: All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new facilities or modifications to existing facilities must place the tank on an impermeable type pad within the berm.
6. Above Ground Saddle Tanks: Above ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.
7. Labeling: All tanks, drums, and other containers should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill, or ignite.

8. Below Grade Tanks/Sumps: All below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All pre-existing sumps and below-grade tanks must be tested to demonstrate their mechanical integrity no later than December 15, 2001 and every year from tested date, thereafter. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD approved methods. The OCD will be notified at least 72 hours prior to all testing. The test results will be submitted to OCD annually by December 31 of each year.
9. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity no later than December 15, 2001 and every 5 years, from tested date, thereafter. Permittees may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing. The test results will be submitted to OCD by December 31, 2001.
10. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be approved for construction and/or operation unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD regulated facilities which inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.
11. Housekeeping: All systems designed for spill collection/prevention, and leak detection will be inspected daily to ensure proper operation and to prevent over topping or system failure. All spill collection and/or secondary containment devices will be emptied of fluids within 48 hours of discovery. A record of inspection will be retained on site for a period of five years.
12. Spill Reporting: All spills/releases shall be reported pursuant to OCD Rule 116. and WQCC 1203. to the OCD Aztec District Office.
13. Waste Disposal: All wastes will be disposed of at an OCD approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.

Rule 712 Waste: Pursuant to Rule 712, disposal of certain non-domestic waste is allowed at solid waste facilities permitted by the New Mexico Environment Department as long as the waste stream is identified in the discharge plan, and existing process knowledge of the waste stream does not change without notification to the Oil Conservation Division. The following waste is hereby approved:

1. Solid Waste (Trash/Refuse).
 2. Cooling water evaporation pond sediment generated on-site.
 3. Activated Alumina generated from the EPBC dryer system.
 4. Used Sulfa-clean.
 5. Molecular Seive.
 6. Solids and sludges listed in discharge plan section VIII.C.2.B. must be approved on a case-by-case basis.
-
14. OCD Inspections: Additional requirements may be placed on the facility based upon results from OCD inspections. As a result of OCD's inspection on August 02, 2001 Conoco Inc. shall investigate the evaporation ponds primary liners to determine if they are leaking. Please report the results of your findings by December 31, 2001.
 15. Storm Water Plan: Conoco, Inc. shall maintain stormwater runoff controls as submitted in the discharge plan item X. C. "Procedures for Containment of Precipitation and Runoff". As a result of Conoco's operations if any water contaminant that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 is discharged in any stormwater run-off then Conoco shall notify the OCD within 24 hours, modify the plan within 15 days and submit for OCD approval. Conoco shall also take immediate corrective actions pursuant to Item 12 of these conditions.
 16. East and West Double-Lined Waste Water Evaporation Ponds: A minimum freeboard will be maintained in the ponds so that no over topping of wastewater occurs. Any repairs or modifications to the pond liners and/or leak detection systems must receive prior OCD approval. Leaks and releases shall be reported pursuant to Item 12. (Spill Reporting) of these conditions.
 17. Leak Detection Monitor Wells: All leak detection monitor wells must be inspected for fluids monthly. Records will be maintained to include quantity of fluid measured, date of inspection, and name of inspector. Any fluids found must be reported to the NMOCD Santa Fe Environmental Bureau and the appropriate District office within 24 hours of discovery.

18. Transfer of Discharge Plan: The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.
19. Closure: The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.
20. Certification: **Conoco Inc.** by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. **Conoco Inc.** further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Conditions accepted by: **Conoco Inc.**

Company Representative- print name

Date _____
Company Representative- Sign

Title _____



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

Jennifer A. Salisbury

Cabinet Secretary

August 03, 2001

Lori Wrotenbery

Director

Oil Conservation Division

Mr. Micky Colomb
Cococo Inc.
P.O. Box 217
Bloomfield, NM 87413

RE: Solid Waste Disposal Request for Activated Alumina
Generator, Conoco, Inc. San Juan Gas Plant
Disposal Location, San Juan County Regional Landfill
New Mexico Environment Department RCRA Subtitle D Solid Waste Facility

Dear Mr. Colomb:

The New Mexico Oil Conservation Division (OCD) received Conoco's disposal request during OCD's plant visit on August 02, 2001 at the San Juan Gas Plant, Bloomfield, NM. Conoco Inc. has supplied OCD with a copy of a "Generator's Waste Profile Sheet" WMI CD 1444 supplied to and approved by Waste Management to dispose of Activated Alumina at the above mentioned landfill permitted by the New Mexico Environment Department. The OCD has reviewed your request and profile sheet and hereby approves of your request with the following conditions:

1. The waste shall be RCRA non-hazardous and Conoco Inc. shall dispose of this waste pursuant to OCD rule 712.
2. This approval shall expire September 15, 2001.

Please be advised that our approval does not relieve Conoco Inc. of liability should your operation result in pollution of surface water, ground water, or the environment. In addition, OCD approval does not relieve Conoco Inc. of responsibility for compliance with other federal, state or local laws and/or regulations.

If you have any questions please do not hesitate to contact me at (505) 476-3487.

Sincerely,

Wayne Price- Pet. Engr. Spec.
OCD Environmental Bureau

Cc: Aztec OCD Office
Don Beardsley, NMED SWB



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON

Governor

Jennifer A. Salisbury

Cabinet Secretary

August 02, 2001

Lori Wrotenbery

Director

Oil Conservation Division

Mr. Micky Colomb
Cococo Inc.
P.O. Box 217
Bloomfield, NM 87413

RE: Solid Waste Disposal Request for Molecular Sieve
Generator, Conoco, Inc. San Juan Gas Plant
Disposal Location, San Juan County Regional Landfill
New Mexico Environment Department RCRA Subtitle D Solid Waste Facility

Dear Mr. Colomb:

The New Mexico Oil Conservation Division (OCD) received Conoco's disposal request during OCD's plant visit today at the San Juan Gas Plant, Bloomfield, NM. Conoco Inc. supplied OCD with a copy of a "Generator's Waste Profile Sheet" WMI 266209 supplied to and approved by Waste Management to dispose of Molecular Sieve at the above mentioned landfill permitted by the New Mexico Environment Department. The OCD has reviewed your request and profile sheet and hereby approves of your request with the following conditions:

1. The waste shall be RCRA non-hazardous and Conoco Inc. shall dispose of this waste pursuant to OCD rule 712.
2. This approval shall expire September 15, 2001.

Please be advised that our approval does not relieve Conoco Inc. of liability should your operation result in pollution of surface water, ground water, or the environment. In addition, OCD approval does not relieve Conoco Inc. of responsibility for compliance with other federal, state or local laws and/or regulations.

If you have any questions please do not hesitate to contact me at (505) 476-3487.

Sincerely,

Wayne Price- Pet. Engr. Spec.
OCD Environmental Bureau

Cc: Aztec OCD Office
Don Beardsley, NMED SWB

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. dated 6/25/01
or cash received on in the amount of \$ 100⁰⁰
from VICTORIA L. SANCHEZ- CONOCO SJGP MISC - CK
for SAJUAN GAS PLANT GW-035.

Submitted by: (Family Name) Data: (DP No.)
Submitted to ASD by: WAYNE PRICE Data: 7/3/01
Received in ASD by: Data:

Filing Fee ☒ New Facility ☐ Renewal ☐
Modification ☐ Other ☐ (Optional)

Organization Code 521.07 Applicable FY 2002

To be deposited in the Water Quality Management Fund.

Full Payment ☐ or Annual Increment ☐

VICTORIA L. SANCHEZ CONOCO SJGP - MISC - CK P O BOX 217 BLOOMFIELD, NM 87413-0217		DATE <u>6/25/01</u>	17-2/910
PAY TO THE ORDER OF <u>NMED Water Quality Management</u>		\$ <u>100⁰⁰</u>	XX
<u>one hundred dollars and no/100's</u>		DOLLARS	Security features included. Details on back.
usbank	U.S. Bank National Association N12 Fargo, ND (0913)	PAYABLE THROUGH U.S. Bank National Association Minneapolis, MN 55440	NOT PAYABLE FOR CASH AND/OR OVER \$2,500.00
FOR <u>GW-035 Conoco Injunct The Plant 1 Victoria L Barker</u>			

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. dated 5/16/00
or cash received on in the amount of \$ 1717.50
from CONOCO SAN JUAN
for MALJAMAL GAS PLANT GW-035
Submitted by: WAYNE PRICE (Family Name) Date: 5/22/00 (CP No.)
Submitted to ASD by: [Signature] Date: "
Received in ASD by: Date:
Filing Fee New Facility Renewal ✓
Modification Other (specify)
Organization Code 521.07 Applicable FY 2000

To be deposited in the Water Quality Management Fund.

Full Payment ✓ or Annual Increment

DIANE S. WIERENGA CONOCO-SJGP-MISC-CK P O BOX 217 BLOOMFIELD, NM 87413-0217		DATE <u>5/16/00</u>	17-2/910
PAY TO THE ORDER OF <u>Oil Conservation Div.</u>		17-2/910	
<u>NM Energy, Thrift. + Nat'l Res. Dept.</u>		\$ <u>1717.50</u>	
<u>One thousand seven hundred seventeen + 50/100</u>		Security features included. Details on back	
usbank U.S. Bank National Association ND Fargo, ND (0913)	PAYABLE THROUGH U.S. Bank National Association Minneapolis, MN 55440	NOT PAYABLE FOR CASH AND OR OVER \$2500.00	
<u>Conoco Inc</u>		<u>[Signature]</u>	
FOR <u>STGP GW-035</u>		<u>[Signature]</u>	
<u>3/14/00</u>			

© HARLAND

Box 1980
 NM 88241-1980
 (505) 748-1283
 First
 NM 88210
 (505) 334-6178
 Rio Brazos Road
 NM 87410
 (505) 827-7131

New Mexico
 Energy Minerals and Natural Resources Department
 Oil Conservation Division
 2040 South Pacheco Street
 Santa Fe, New Mexico 87505
 (505) 827-7131

Form C-138
 Originated 8/8/95

Submit Original
 Plus 1 Copy
 to appropriate
 District Office

52

REQUEST FOR APPROVAL TO ACCEPT SOLID WASTE

RCRA Exempt: <input type="checkbox"/> Non-Exempt: <input checked="" type="checkbox"/>	4. Generator <u>CONOCO INC.</u>
Verbal Approval Received: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	5. Originating Site <u>SAN JUAN GAS PLANT</u>
Management Facility Destination <u>TNT CONSTRUCTION INC</u>	6. Transporter <u>DAWN</u>
Address of Facility Operator <u>HCR 74 BOX 113 LINDRITH NM 87029</u>	8. State <u>N.M.</u>
Location of Material (Street Address or ULSTR)	

Circle One:

A. All requests for approval to accept offfield exempt wastes will be accompanied by a certification of waste from the Generator; one certificate per job.

B. All requests for approval to accept non-exempt wastes must be accompanied by necessary chemical analysis to PROVE the material is not-hazardous and the Generator's certification of origin. No waste classified hazardous by listing or testing will be approved.

All transporters must certify the wastes delivered are only those consigned for transport.

BRIEF DESCRIPTION OF MATERIAL:

WASH-DOWN WATER

RECEIVED

OCT 9 1996

Environmental Bureau
 Oil Conservation Division

RECEIVED
 OCT - 7 1996
 OIL CON. DIV.
 DIST. 3

Estimated Volume 8000 GAL. or Known Volume (to be entered by the operator at the end of the haul) _____ cy

SIGNATURE: [Signature] TITLE: PRESIDENT DATE: 9/30/96
 Waste Management Facility Authorized Agent

TYPE OR PRINT NAME: TONY LEE SCHMITZ TELEPHONE NO. 505-774-6504

This space for State Use)

APPROVED BY: [Signature] TITLE: Geologist DATE: 10/7/96

APPROVED BY: [Signature] TITLE: Bureau Chief DATE: 10/7/96



NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

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

September 10, 1996

CERTIFIED MAIL
RETURN RECEIPT NO. P-288-258-620

Mr. Chris Hansen
Conoco, Inc.
P.O. Box 2197-HU 3086
Houston, TX 77252-2197

RE: Disposal of Amine Wash Water
San Juan Gas Plant GW-035
San Juan County, New Mexico

Dear Mr. Hansen:

The New Mexico Oil Conservation Division (OCD) has received your letter dated August 30, 1996 regarding the proper disposal of "Amine Wash Water." Based upon the classification of the waste (Non-exempt) and analytical parameters (Non-hazardous) Conoco has a couple of disposal options for this waste: (1.) Dispose at Sunco Water Disposal - an OCD permitted 711/ Class I non-hazardous injection well, or (2.) Disposal at TNT a OCD permitted 711 facility.

On September 9, 1996 I contacted Mr. Lane Ayers plant manager for the San Juan Gas Plant with regards to the Conoco letter dated August 30, 1996. I asked if he had the analytical report that you had submitted in the August 30, 1996 letter. He indicated that he did, I then informed him of the options mentioned above and explained the OCD procedures for acceptance and approval of non-exempt, non-hazardous oil field wastes at the two above OCD permitted facilities.

If you have any questions regarding this matter please feel free to give me a call at (505)-827-7156.

Sincerely,

Patricio W. Sanchez
Petroleum Engineer,
Environmental Bureau

xc: Mr. Denny Foust - OCD Aztec District Office
Mr. G. Lane Ayers - Plant Manager, Conoco P-288 258-621

P 288 258 620

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to <i>Conrad - Hansen</i>	
Street & Number <i>Amherst</i>	
Post Office, State, & ZIP Code <i>San Juan Gas Plant</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995

P 288 758 621

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to <i>Conrad - Ayers</i>	
Street & Number <i>Amherst</i>	
Post Office, State, & ZIP Code <i>San Juan Gas Plant</i>	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, April 1995

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone

☐ Personal

Time 3:15 PM

Date 9-9-96

Originating Party

Other Parties

Pat Sanchez - OCD

Lane Ayers - Conuco (Sun Jan 6.P)
632-4900 (GW-035)

Subject

August 30, 1996 letter from Chris J. Hansen - Conuco
Houston - to Mark Ashley - OCD. "Amine wash water"

Discussion

Let Mr. Ayers know that I tried to contact
Mr. Hansen in Houston - Got voice mail left him a message.

Discussed the analysis of the "wash water" -

(1) Non-Exempt from RCRA Subtitle C.

(2) Analysis shows the "wash water" to be
Non-Hazardous.

Let Mr. Ayers know about TNT & Sunco - both
OCD permitted facilities that can receive Non-Haz. / Non-Exempt
oil field wastewaters. (Explained C-138 process).

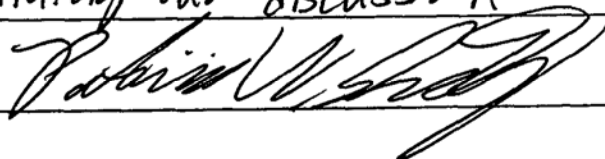
Conclusions or Agreements

Mr. Ayers said he would submit the analysis to
the disposal facility and dispose of properly per Rule 711
and C-138 process. I told Mr. Ayers that I would
write Mr. Hansen a letter outlining our discussion.

Distribution

File, Denny Faust

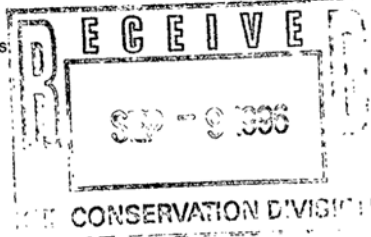
Signed





Chris J. Hansen
Environmental Engineer
Safety and Environmental Services
Natural Gas and Gas Products

Conoco Inc.
P.O. Box 2197, HU3006
Houston, TX 77252-2197
(713) 293-1124
Fax: (713) 293-1214



August 30, 1996

Certified Mail P 365 728 013
Return Receipt Requested

Mr. Mark Ashley
New Mexico Oil Conservation Division
2040 S. Pacheco
Sante Fe, New Mexico 87505

RECEIVED

SEP 09 1996

Environmental Bureau
Oil Conservation Division

Re: Disposal of Amine Wash Water

Dear Mr. Ashley:

We recently cleaned out an amine still at our San Juan Gas Plant in Farmington, New Mexico. The resulting solution was tested and found not to have any characteristic hazard. The corresponding analytical results are enclosed for your review. Other than water, the only other substance introduced during the cleaning process was some sulfuric acid. It is unclear if the resulting solution can be handled as an exploration and production waste and taken for disposal to a Class 2 injection well. Based on the enclosed analytical results and information provided, please advise us (in writing) as to how the OCD recommends we handle or treat this waste stream.

Should you have any questions or need to discuss this further, please call me at (713) 293-1124. Thank you for your assistance and guidance in this matter.

Sincerely,

Chris J. Hansen

Enc

Ms. Kathy Kanocz
Conoco
GW-035 Renewal
Page 2
July 8, 1996

Please note that Section 3104 of the regulations requires that "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C Conoco is required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

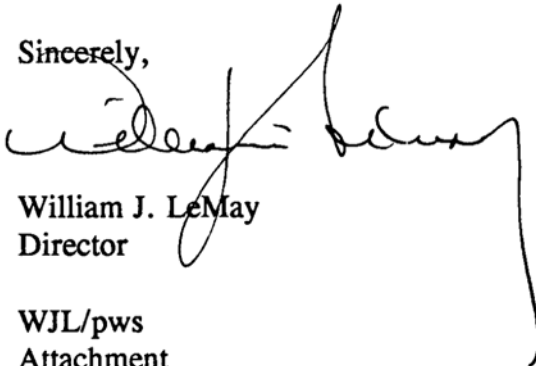
Pursuant to Section 3109.G.4, this plan is for a period of five (5) years. **This approval will expire October 27, 2001**, and an application for renewal should be submitted in ample time before that date. It should be noted that all discharge plan facilities will be required to submit plans for, or the results of, an underground drainage testing program as a requirement for discharge plan renewal.

The discharge plan renewal for the Conoco "San Juan" Gas Plant GW-035 is subject to the WQCC Regulation 3114 discharge plan fee. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of \$50. The flat fee for gas plant discharge plan renewal is \$ 1,667.50.

Note: The filing fee and flat fee have both been received by the OCD.

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

Sincerely,



William J. LeMay
Director

WJL/pws
Attachment

xc: Mr. Denny Foust

P 594 835 873

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

Sent to Conoco, Inc. - Ms. Kanocz	
Street & Number P.O. Box 2197-HU 3086	
Post Office, State, & ZIP Code Houston, TX 77252-2197	
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	

PS Form 3800, April 1995



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

July 8, 1996

CERTIFIED MAIL
RETURN RECEIPT NO. P-594-835-273

Ms. Kathy Kanocz
Conoco, Inc.
P.O. Box 2197-HU 3086
Houston, TX 77252-2197

**RE: Approval of Discharge Plan GW-035
Renewal "San Juan " Gas Plant
San Juan County, New Mexico**

Dear Ms. Kanocz:

The discharge plan renewal GW-035 for the Conoco "San Juan" Gas Plant located in the NW/4 NW/4, Section 14, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico, is hereby approved under the conditions contained in the enclosed attachment. The discharge plan renewal consists of the following items: The renewal application dated May 15, 1996 from Conoco, the discharge plan approval letter from OCD dated October 11, 1991, the discharge plan modification approval letter from OCD dated January 7, 1993, the inspection report from OCD dated June 27, 1996, and this renewal approval with conditions from OCD dated July 8, 1996. 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 five working days of receipt of this letter.**

The discharge plan renewal application was submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission Regulations. Please note Sections 3109.E and 3109.F which provide for possible future amendments or modifications of the plan. Please be advised that the approval of this plan does not relieve Conoco of liability should the operations associated with this facility result in pollution of surface water, ground water, or the environment.

Please be advised that all exposed pits, including lined pits and open top tanks (tanks exceeding 16 feet in diameter), shall be screened, netted, or otherwise rendered nonhazardous to wildlife including migratory birds.

Ms. Kathy Kanocz
Conoco
GW-035 Renewal
Page 3
July 8, 1996

ATTACHMENT TO DISCHARGE PLAN GW-035 RENEWAL
Conoco - "San Juan" Gas Plant
DISCHARGE PLAN REQUIREMENTS
(July 8, 1996)

1. **Conoco Commitments:** Conoco will abide by the commitments and conditions made in the following: The renewal application dated May 15, 1996 from Conoco, the discharge plan approval letter from OCD dated October 11, 1991, the discharge plan modification approval letter from OCD dated January 7, 1993, the inspection report from OCD dated June 27, 1996, and this renewal approval with conditions from OCD dated July 8, 1996.

2. **Drum Storage:** All drums containing materials other than fresh water must be stored on an impermeable pad and curb type containment. All empty drums should be stored on their sides with the bungs in place and lined up on a horizontal plane. Chemicals in other containers such as sacks or buckets should also be stored on an impermeable pad and curb type containment.

All drums and chemical containers shall be clearly labeled to identify their contents and other emergency information necessary if they were to rupture, spill, or ignite.

3. **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.

4. **Above Ground Tanks:** All above ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new facilities or modifications to existing facilities must place the tank on an impermeable type pad.

5. **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.

6. **Tank Labeling:** All tanks should be clearly labeled to identify their contents and other emergency information necessary if the tank were to rupture, spill, or ignite.

7. **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

Ms. Kathy Kanocz
Conoco
GW-035 Renewal
Page 4
July 8, 1996

leak-detection into the design. All pre-existing sumps and below-grade tanks that do not have secondary containment and leak detection 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 /or sumps.

8. **Underground Process/Wastewater Lines:** All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years there after. Companies 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 so that an OCD representative may witness the testing.

9. **Housekeeping:** All systems designed for spill collection/prevention should be inspected to ensure proper operation and to prevent overtopping or system failure.

Any contaminated soils that are collected at the facility will be tested for hazardous constituents, and after receiving OCD approval, will be disposed of at an OCD approved site.

10. **Spill Reporting:** All spills/releases shall be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD District Office at (505)-334-6178.

11. **Transfer of Discharge Plan:** The OCD will be notified prior to any transfer of ownership, control, or possession of a facility with an approved discharge plan. A written commitment to comply with the terms and conditions of the previously approved discharge plan must be submitted by the purchaser and approved by the OCD prior to transfer.

12. **New Mexico Oil Conservation Division Inspections:** Additional requirements may be placed on the facility based upon results from New Mexico Oil Conservation Division inspections.

13. **Closure:** The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure plan will be submitted for approval by the director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

14. **Conditions accepted by:** _____
Company Representative Date

Title

NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan renewal application has been submitted to the Director of the Oil Conservation Division, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

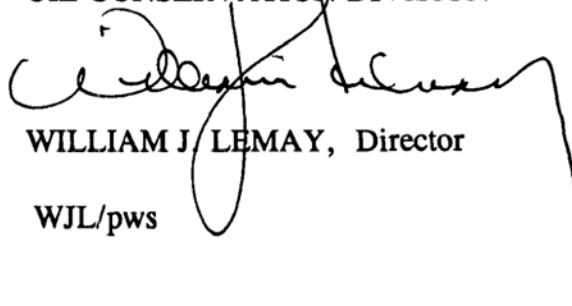
(GW-35) - Conoco, Inc. , Mr. Rick McCalip, (713)-293-1123, P.O. Box 2197 - HU 3000, Houston, Tx, 77252-2197, has submitted a Discharge Plan Renewal Application for their San Juan Gas Plant located in the NW/4 NW/4, Section 14, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. Approximately 14,580 gallons per day of waste water be discharged onsite into an above ground bermed closed top tank and two double lined surface evaporation ponds with leak detection prior to transport offsite at an approved OCD disposal facility; Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 15 to 55 feet with a total dissolved solids concentration of approximately 4,400 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 public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 23rd day of May, 1996.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION



WILLIAM J. LEMAY, Director

WJL/pws

S E A L

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [REDACTED] dated 5/16/96

or cash received on _____ in the amount of \$ 1717.50

from Canoco

for San Juan G.P. GW-035

Submitted by: _____ Date: _____

Submitted to ASD by: R.C. Anderson Date: 5/31/96

Received in ASD by: Donna Salazar Date: 5-31-96

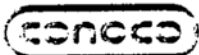
Filing Fee _____ New Facility _____ Renewal X

Modification _____ Other _____

Organization Code 521.07 Applicable FY 96

To be deposited in the Water Quality Management Fund.

Full Payment X or Annual Increment _____



No. [REDACTED]

CONOCO INC
PONCA CITY, OK 74602

To: Citibank Delaware
New Castle, DE

MAY 16, 1996

*** VOID AFTER 90 DAYS ***

Vendor Code: 165931R03

Exactly *****\$1,717.50**

Pay
To the
Order
of

|||||
NMED WATER QUALITY MANAGEMENT
OIL CONSERVATION DIVISION
PO BOX 6429
SANTA FE NM 87502-6429

John E. Sayant
Authorized Signature

S H	Voucher Reference	Invoice Date	Invoice Number	1099 CD	Gross Amount	ADJ CD	Adjustment Amount	Discount Amount	Net Amount
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VENDOR NAME: NMED WATER QUALITY MANAGEMENT

IN CASE OF QUESTIONS ABOUT THE FOLLOWING INVOICES, PLEASE CALL (713) 293-1643

S 0506115DC136A028 19960515 RQC99715

1,717.50

.00

.00

1,717.50

*SAN JUAN DISCHARGE PLAN

* * * INQUIRIES ON ABOVE INVOICES SHOULD BE DIRECTED TO PHONE NO. LISTED ABOVE

TOTAL NET AMOUNT

\$1,717.50

San Juan Plant - GW-035

OIL CONSERVATION DIVISION

October 19, 1995

CERTIFIED MAILRETURN RECEIPT NO. Z-765-963-084

Mr. Lane Ayers
 Plant Manager-NG&GP
 Conoco, Inc.
 P.O. Box 217
 Bloomfield, NM 87413

**RE: Discharge Plan GW-35 Renewal
 San Juan Gas Processing Plant
 San Juan County, New Mexico**

Dear Mr. Ayers:

On October 11, 1991, the groundwater discharge plan, GW-35, for the Conoco San Juan Gas Plant located in NW/4 NW/4, Section 14, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico, will expire on October 27, 1996. The plan was approved by the Director of the New Mexico Oil Conservation Division (OCD). This discharge plan was required and submitted pursuant to Water Quality Control Commission (WQCC) regulations and was approved for a period of five years.

If your facility continues to have potential or actual effluent or leachate discharges and you wish to continue operation, you must renew your discharge plan. If Conoco Inc. (NG&GP) submits an application for renewal at least 120 days before the discharge plan expires (on or before June 27, 1996), then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved. The OCD is reviewing discharge plan submittals and renewals carefully and the review time can extend for several weeks to months. Please indicate whether you have made, or intend to make, any changes in your system, and if so, please include these modifications in your application for renewal.

The discharge plan renewal application for the San Juan Gas Plant is subject to the WQCC Regulations 3-114 discharge plan fee. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of fifty (50) dollars plus a flat fee of \$1,667.50 for Natural Gas Plants.

The (50) dollar filing fee is to be submitted with the discharge plan renewal application and is nonrefundable. The flat fee for an approved discharge plan renewal may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan - with the first payment due at the time of approval. Please make all checks payable to: NMED-Water Quality Management and addressed to the OCD Santa Fe Office.

OFFICE OF THE SECRETARY - P. O. BOX 6429 - SANTA FE, NM 87505-6429 - (505) 827-5950
 ADMINISTRATIVE SERVICES DIVISION - P. O. BOX 6429 - SANTA FE, NM 87505-6429 - (505) 827-5925
 ENERGY CONSERVATION AND MANAGEMENT DIVISION - P. O. BOX 6429 - SANTA FE, NM 87505-6429 - (505) 827-5900
 FORESTRY AND RESOURCES CONSERVATION DIVISION - P. O. BOX 1948 - SANTA FE, NM 87504-1948 - (505) 827-5830
 MINING AND MINERALS DIVISION - P. O. BOX 6429 - SANTA FE, NM 87505-6429 - (505) 827-5970
 OIL CONSERVATION DIVISION - P. O. BOX 6429 - SANTA FE, NM 87505-6429 - (505) 827-7131
 PARK AND RECREATION DIVISION - P. O. BOX 1147 - SANTA FE, NM 87504-1147 - (505) 827-7465

Mr. Lane Ayers
October 19, 1995
Page 2

Please submit the original and one copy to the OCD Santa Fe Office and one copy to the OCD Aztec District Office. Note that the completed and signed application form must be submitted with your discharge plan renewal request. The following information is included: Application form, Guidelines, and WQCC regulations.

If you no longer have any actual or potential discharges a discharge plan is not needed, please notify this office. If you have any questions regarding this matter, please do not hesitate to contact Mr. Patricio W. Sanchez at (505) 827-7156.

Sincerely,



Roger C. Anderson
Environmental Bureau Chief

RCA/pws

xc: Mr. Denny Foust

Z 765 963 084



**Receipt for
Certified Mail**

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

Sent to <u>GW-35 Rm.</u>	
Street and No.	
P.O., State and ZIP Code	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, and Addressee's Address	
TOTAL Postage & Fees	\$
Postmark or Date	

PS Form 3800, March 1993

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



January 7, 1993

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

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

CERTIFIED MAIL
RETURN RECEIPT NO. P-667-242-148

• Mr. Rick McCalip
Conoco Inc.
P.O. Box 2197, HU 3034
Houston, Texas 77252

RE: Discharge Plan GW-35 Modification
San Juan Basin Gas Processing Plant
San Juan County, New Mexico

Dear Mr. McCalip:

The groundwater discharge plan modification for the Conoco Inc. San Juan Basin Gas Processing Plant located in the NW/4 NW/4, Section 14, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico is hereby approved. The modification consists of the discharge plan as renewed on October 11, 1991, the modification as approved on January 21, 1992 and the modification application dated December 4, 1992. The modification proposes the addition of two lined evaporation ponds to accept cooling tower wastewater.

The modification application was submitted pursuant to Section 3-109.F of the Water Quality Control Commission Regulations. It is approved pursuant to Section 3-109.A. Please be advised that approval of this plan does not relieve you of liability should your operation result in actual pollution of surface or ground waters or the environment which may be actionable under other laws and/or regulations.

Please be advised that all exposed pits, including lined pits and open top tanks (tanks exceeding 16 feet in diameter) shall be screened, netted or otherwise rendered nonhazardous to wildlife including migratory birds.

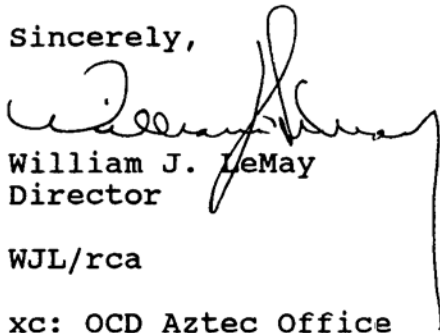
Please note that Section 3-104 of the regulations requires that "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan". Pursuant to Section 3-107.C you are required to notify the Director of any facility expansion,

Mr. Rick McCalip
January 7, 1993
Page -2-

production increase, or process modification that would result in any change in the discharge of water quality or volume.

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

Sincerely,

A handwritten signature in dark ink, appearing to read 'William J. LeMay', is written over the typed name and title. The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

William J. LeMay
Director

WJL/rca

xc: OCD Aztec Office

The Santa Fe New Mexican

Since 1849. We Read You.

NM OIL CONSERVATION
ATTN: SALLY MARTINEZ
2040 S. PACHECO
SANTA FE, NM 87505

AD NUMBER: 508043

ACCOUNT: 56689

LEGAL NO: 59758

P.O. #: 96-199-002997



Rec. by [signature]
on 6-11-96

174 LINES once at \$ 69.60
Affidavits: 5.25
Tax: 4.68
Total: \$ 79.53

NOTICE OF PUBLICATION

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday thru Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and a public hearing may be requested by any interested person. Requests for a public hearing shall set forth the reasons why a hearing 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 23rd day of May, 1996.

STATE OF NEW MEXICO
OIL CONSERVATION
DIVISION
WILLIAM J. LEMAY,
Director
Legal #59758
Pub. May 31, 1996

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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 # 59758 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 31 day of May 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 3 day of June A.D., 1996



OFFICIAL SEAL
Candace C. Ruiz
NOTARY PUBLIC - STATE OF NEW MEXICO

My Commission Expires: 9/29/99

Candace C. Ruiz

AFFIDAVIT OF PUBLICATION

No. 36427

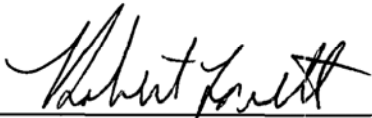
STATE OF NEW MEXICO

County of San Juan:

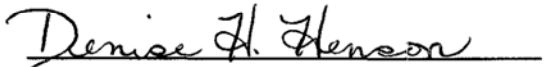
ROBERT LOVETT being duly sworn says: That he is the Classified Manager of THE DAILY TIMES, a daily newspaper of general circulation published in English at Farmington, said county and state, and that the hereto attached Legal Notice was published in a regular and entire issue of the said DAILY TIMES, 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):

Wednesday, June 5, 1996;

and the cost of publication is: \$61.02.



On 6/7/96 ROBERT LOVETT appeared before me, whom I know personally to be the person who signed the above document.


My Commission Expires ~~April 2, 2000~~
May 17, 2000

RECEIVED

JUN 17 1996

Environmental Bureau
Oil Conservation Division

COPY OF PUBLICATION

Legals

NOTICE OF PUBLICATION

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

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SEAL

WJL/pws

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
/s/William J. Lemay
WILLIAM J. LEMAY, Director

Legal No. 36427 published in The Daily Times, Farmington, New Mexico on Wednesday, June 5, 1996.