

GW - 35

**REPORTS**

**YEAR(S):**

---

2007 - 1997



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

GW-035

SCAN

Todd A. Kinard  
Compliance Coordinator  
Phone 505-632-4954  
Cell 505-330-8309  
Fax 505-632-4930  
[Todd.A.Kinard@conocophillips.com](mailto:Todd.A.Kinard@conocophillips.com)

RECEIVED  
2007 OCT 12 AM 10:21

October 8, 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  
Pressure testing of underground wastewater piping systems.**

Dear Mr. Price:

As required by our Ground Water Discharge Plan, and by the State of New Mexico Oil Conservation Division, notification was made to Brandon Powell of our intent to inspect the Oil Water Skimmer Basin and test all underground piping and vessels associated with the following systems: Lube Oil Drain (Main and Air Compressor Sections), Amine Drain, Amine Waste Drain, and Open Drain (Main and Pump Alley sections). These systems were pressure tested to a minimum of 3 PSI above normal operating pressure and held on pressure test 30 minutes for piping, and 60 minutes for vessels, between September 28<sup>th</sup> and October 4<sup>th</sup> 2007. The attached documentation shows that all systems passed the pressure test and indicates that the inspection of the Oil Waste Skimmer Basin was conducted and results were satisfactory.

If you have any questions or concerns, please feel free to contact me.

Sincerely,

Todd Kinard

Enclosures

cc: Beverly Cox, Room 493  
3401 E. 30<sup>th</sup> Street  
Farmington, NM 87499  
File: 2859-3

CONOCO, INC.  
SAN JUAN GAS PLANT

HYDROSTATIC PRESSURE TESTING

Date: 9, 28, 07 Inspector: Pearl Leland

System or Equipment Being Tested: open Drain System upper

Plant ID Number: N/A Vessel or Equipment Serial No: N/A

Maximum Working Pressure: \_\_\_\_\_

Test Pressure: 3 PSI (~~Maximum Working Pressure X 1.5~~)

Time	PSIG	Temp. °F
<u>1:00 pm</u>	<u>3</u>	<u>72°</u>
<u>1:10 pm</u>	<u>3</u>	<u>72°</u>
<u>1:20 pm</u>	<u>3</u>	<u>72°</u>
<u>1:30 pm</u>	<u>3</u>	<u>72°</u>
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Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
=====

Circulate: Process Foreman \_\_\_\_\_  
Maintenance Foreman N/A  
Plant Manager \_\_\_\_\_

CONOCO, INC.  
SAN JUAN GAS PLANT

HYDROSTATIC PRESSURE TESTING

Date: 10/1/07 Inspector: Dean Leland

System or Equipment Being Tested: Lube oil open Drain and Tank

Plant ID Number: N/A Vessel or Equipment Serial No: N/A

Maximum Working Pressure: \_\_\_\_\_

Test Pressure: 3.2 psig (~~Maximum Working Pressure X 1.5~~)

Time	PSIG	Temp. °F
<u>2:10 pm</u>	<u>3.2</u>	<u>73°</u>
<u>2:20 pm</u>	<u>3.2</u>	
<u>2:30 pm</u>	<u>3.2</u>	
<u>2:40 pm</u>	<u>3.2</u>	
<u>2:50 pm</u>	<u>3.2</u>	
<u>3:00 pm</u>	<u>3.2</u>	
<u>3:10 pm</u>	<u>3.2</u>	
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Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
=====

Circulate: Process Foreman \_\_\_\_\_  
Maintenance Foreman N/A  
Plant Manager \_\_\_\_\_

CONOCO, INC.  
SAN JUAN GAS PLANT

HYDROSTATIC PRESSURE TESTING

Date: 10, 4, 07 Inspector: Dean Heland

System or Equipment Being Tested: Open Drain System Lower

Plant ID Number: N/A Vessel or Equipment Serial No: N/A

Maximum Working Pressure: \_\_\_\_\_

Test Pressure: 4.5 (~~Maximum Working Pressure X 1.5~~)

<u>Time</u>	<u>PSIG</u>	<u>Temp. °F</u>
<u>2:30 pm</u>	<u>4.5</u>	<u>75°</u>
<u>2:40 pm</u>	<u>4.5</u>	
<u>2:50 pm</u>	<u>4.5</u>	
<u>3:00 pm</u>	<u>4.5</u>	
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Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
=====

Circulate: Process Foreman \_\_\_\_\_  
Maintenance Foreman N/A  
Plant Manager \_\_\_\_\_

\*File - SSF-333 Safety File

CONOCO, INC.  
SAN JUAN GAS PLANT

HYDROSTATIC PRESSURE TESTING

Date: 10, 3, 07 Inspector: Dean Zeland

System or Equipment Being Tested: Amine Regen and Vessel

Plant ID Number: N/A Vessel or Equipment Serial No: N/A

Maximum Working Pressure: \_\_\_\_\_

Test Pressure: 3.5 (~~Maximum Working Pressure X 1.5~~)

Time	PSIG	Temp. °F
<u>1:10 pm</u>	<u>3.5</u>	<u>74°</u>
<u>1:20 pm</u>	<u>3.5</u>	
<u>1:30 pm</u>	<u>3.5</u>	
<u>1:40 pm</u>	<u>3.5</u>	
<u>1:50 pm</u>	<u>3.5</u>	
<u>2:00 pm</u>	<u>3.5</u>	
<u>2:10 pm</u>	<u>3.5</u>	
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Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

=====  
Circulate: Process Foreman \_\_\_\_\_  
Maintenance Foreman N/A  
Plant Manager \_\_\_\_\_

CONOCO, INC.  
SAN JUAN GAS PLANT

HYDROSTATIC PRESSURE TESTING

Date: 10/2/07 Inspector: Dean Leland

System or Equipment Being Tested: Amine Waste + Vessel

Plant ID Number: N/A Vessel or Equipment Serial No: N/A

Maximum Working Pressure: \_\_\_\_\_

Test Pressure: 3 (~~Maximum Working Pressure X 1.5~~)

Time	PSIG	Temp. °F
<u>11:00 AM</u>	<u>3</u>	<u>65</u>
<u>11:10 AM</u>	<u>3</u>	
<u>11:20 AM</u>	<u>3</u>	
<u>11:30 AM</u>	<u>3</u>	
<u>11:40 AM</u>	<u>3</u>	
<u>11:50 AM</u>	<u>3</u>	
<u>12:00 Noon</u>	<u>3</u>	
_____	_____	_____
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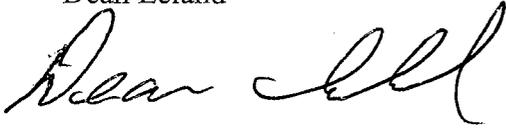
Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
-----

Circulate: Process Foreman \_\_\_\_\_  
Maintenance Foreman N/A  
Plant Manager \_\_\_\_\_

To: File ENV. 2859-3

The Oil Water Skimmer Pit was drained and cleaned on 10-04-2007 For inspection.  
The inside of basin looked to be in good shape with no signs of cracks or potential leaks.

Dean Leland

A handwritten signature in cursive script that reads "Dean Leland". The signature is written in black ink and is positioned below the printed name.



January 19, 2007

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

RECEIVED

JAN 23 2007

Brad A. Jones  
Environmental Engineer  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505

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

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

Certified Mail No.: 7006 0100 0003 2148 0668

Dear Mr. Jones

In accordance with your letter dated, January 9, 2007, ConocoPhillips San Juan Gas Plant conducted the hydrostatic testing of approximately 340 feet of new pipeline.

The test was conducted on January 12, 2007. The piping held approximately 8000 gallons of water. The piping was filled using Bloomfield, NM city water. Upon completion of the test the water was collected and discharged into our cooling tower in accordance with temporary permission letter. No water generated from this test was discharged to groundwater or removed from the site.

If you have any further questions, please contact me at my office, 505-632-4954, or on my cell phone, 505-330-8309.

Thank you,

Todd Kinard  
Compliance Coordinator  
San Juan Basin Gas Plant

tak

cc: Beverly Cox, ConocoPhillips. SJBU RM. 493  
Sam Cudney, Environmental Services Inc.

December 14, 2006

New Mexico Oil Conservation Division  
Environmental Bureau  
Attn: Carl Chavez  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Subject: ConocoPhillips, Inc. Discharge Plan Public Notice for the San Juan Gas Plant (GW-035)

Dear Carl

All of the public notice requirements required by 20.6.2.3108 NMAC have been completed for ConocoPhillips, Inc.'s San Juan Gas Plant Discharge Plan renewal (GW-035). Enclosed please find copies of all of the required notices, postings, advertisements, and certification.

If you have any questions regarding this submittal please feel free to contact me at (505) 266-6611 or Beverly Cox with ConocoPhillips, Inc. at (505) 863-1023.

Sincerely



Cale E. Swanson  
Environmental Scientist III

cc: Beverly Cox (ConocoPhillips, Inc.)  
ESI Project File (CONcox 001)

## Text of the Sign on the Front Gate of the Facility (Reduced from 2' x 3')

### POSTED NOTICE

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

**(GW-035) - ConocoPhillips, Inc., Beverly Cox, Compliance Coordinator, 61 County Road 4900, Bloomfield, New Mexico 87413, has submitted an application for renewal of their previously approved discharge plan for the San Juan Basin Gas Plant located in the NW/4 NW/4 of Section 14, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. Approximately 790,950 gallons per month of waste water is 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. Ground water 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 in order to protect fresh water.**

The New Mexico Oil Conservation Division will accept comments and statements of interest regarding this application and will create a facility-specific mailing list for persons who wish to receive future notices. Persons interested in obtaining further information, submitting comments or requesting to be on a facility-specific mailing list for future notices may contact:

Carl Chavez, CHMM  
Environmental Bureau  
New Mexico Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, New Mexico 87505  
Office: (505) 476-3491

### NOTA DE SEÑALIZACIÓN

Aviso es presentado conforme a la Comision de Regulación de Control de Calidad de Agua de Nuevo México, un permiso para renovasion de permiso para descarga ha sido sometido a el director de la Division de Conservacion de Petroleo, 1220 S. Saint Francis Drive, Santa Fe, Nuevo Mexico 87505, (505) 476-3440:

**(GW-035) - ConocoPhillips, Inc., Beverly Cox, Coordinador de Conformidad, 61 County Road 4900, Bloomfield, Nuevo Mexico 87413, a sometido una aplicacion para la renovasion de el permiso aprobado previamente para un plan de descarga para la Planta de Gas localizada en la esquina noroeste de la esquina noroeste de la Seccion 14, municipio 29 al norte, gama 11 al oeste, NMPM, Condado de San Juan, Nuevo Mexico. Aproximadamente 790,950 galones pro mes de desecho de agau seran descargados en el sitio en un tanque cubierto localizado sobre la tierra y en dos charcas de superficie de evaporacion doble forradas con descubrimiento do salgase antes do transportar a una facilidad de disposicion aprobada por OCD. Auga mas probable de ser afectada por derrames accidentales sera de una profundidad de aproximadamente 15 a 55 pies con un total de solidos disueltos con concentracion de aproximadament 4,400 mg/L. El plan de descarga consiste de una descripcion de como derrames accidentales a la superfecie seran manajados para proteger la agua fresca.**

La Division de Conservacion de Petroleo de Nuevo Mexico (New Mexico Oil Conservation Division) aceptara comentarios y declaraciones de interes y creara una lista eespecifica a la facilidad para personas deseando recibir noticias futuras por correo. Personas interesadas en obtener informacion futura o deseando ser puesto en una lista especifica para recibir noticias futuras por correo deben ponerse en contacto con:

Sr. Carl Chavez,, CHMM  
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New Mexico Oil Conservation Division  
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Sr. Carl Chavez,, CHMM  
Environmental Bureau  
New Mexico Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, New Mexico 87505  
Oficina: (505) 476-3491

**General Posting of Notices – Certification**

I, TODD KINARD, the undersigned, certify that on 11-29-06 (date), I posted a true and correct copy of the attached Public Notice in the following publicly accessible and conspicuous places in the City\Town\Village of BLOOMFIELD, SAN JUAN County, State of New Mexico on the following dates:

1. Discharge Location 11-29-06 (date)
2. Bloomfield Public Library 11-29-06 (date)

Signed this 29<sup>TH</sup> day of NOVEMBER, 2006.

Todd Kinard  
Signature

11-29-06  
Date

TODD KINARD  
Printed Name

Compliance Coordinator  
Title (Applicant)

## Text of Letters Sent to Landowners

December 1, 2006

### PUBLIC NOTICE

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Carl Chavez, CHMM  
Environmental Bureau  
New Mexico Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, New Mexico 87505  
Office: (505) 476-3491

### NOTA DE PÚBLICO

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Sr. Carl Chavez,, CHMM  
Environmental Bureau  
New Mexico Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, New Mexico 87505  
Oficina: (505) 476-3491

Neighboring Land Owners

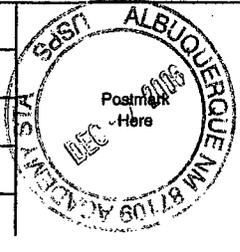
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 Pam Kee  
 PO Box 1733  
 Bloomfield, NM 87413-1733

PS Form 3800, Au

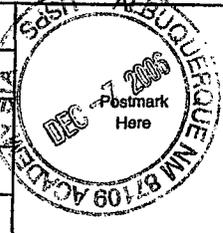
7006 2150 0004 1254 3578

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Sent To  
 Jay Greenleaf Et Al  
 1404 W Aztec Blvd  
 Aztec, NM 87410-1802

PS Form 3800, Au

7006 2150 0004 1254 3585

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Sent To  
 Joe Silviano Abeyta Et Al  
 4321 Woodward Ave  
 Norco, CA 92860-3506

PS Form 3800, Au

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 Castiano Construction Inc.  
 306 Kath Lynn  
 Bloomfield, NM 87413-5213

PS Form 3800, Au

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Sent To  
 James B Thompson Et Ux  
 PO Box 907  
 Bloomfield, NM 87413-0907

PS Form 3800, Au

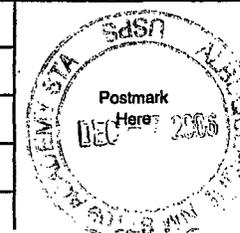
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Sent To  
 Sam Schoser Et Ux  
 1730 Tucson  
 Bloomfield, NM 87413

PS Form 3800, Au

Neighboring Land Owners

7006 2150 0004 1254 3530

**U.S. Postal Service™**  
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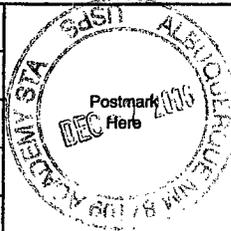
For delivery information visit our website at [www.usps.com](http://www.usps.com)

**OFFICIAL USE**

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Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 2.79

**Sent To**  
 David and Genelle Beattie  
 604 Smith Ln  
 Bloomfield, NM 87413

PS Form 3800, A



7006 2150 0004 1254 3516

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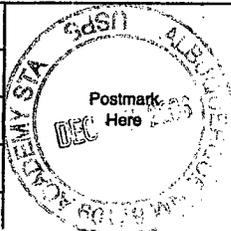
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Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
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**Sent To**  
 David Largo  
 PO Box 1584  
 Bloomfield, NM 87413-1584

PS Form 3800, A



7006 2150 0004 1254 3493

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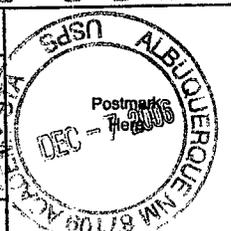
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Certified Fee	2.40
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 2.79

**Sent To**  
 James Greenleaf Et Al  
 70 CR 3133  
 Aztec, NM 87410

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Certified Fee	2.40
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 2.79

**Sent To**  
 Thomas A Roberts Et Ux  
 PO Box 1016  
 Bloomfield, NM 87413-1016

PS Form 3800, A



7006 2150 0004 1254 3502

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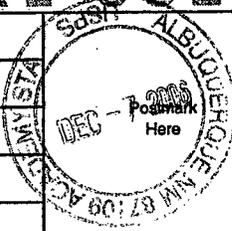
For delivery information visit our website at [www.usps.com](http://www.usps.com)

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Postage	\$ 0.39
Certified Fee	2.40
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 2.79

**Sent To**  
 LGD Investments LLC  
 33 CR 3535  
 Flora Vista, NM 87412

PS Form 3800, A



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Certified Fee	2.40
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$ 2.79

**Sent To**  
 Mike Greenleaf Et Al  
 PO Box 1121  
 Aztec, NM 87410

PS Form 3800, A



Neighboring Land Owners

7006 2150 0004 1254 3479

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Certified Fee	2.40
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$ 2.79</b>



Sent To  
 Street, Apt. No., or PO Box No. Miguel A Martinez  
 200 Romans Ln  
 City, State, ZIP+4 Bloomfield, NM 87413-6794

PS Form 3800, A

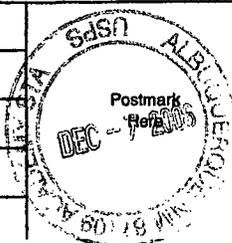
2462 4521 4000 1254 3462

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Certified Fee	2.40
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$ 2.79</b>



Sent To  
 Street, Apt. No., or PO Box No. Steven and Marie Gabaldon  
 2014 San Juan Blvd  
 City, State, ZIP Farmington, NM 87401

PS Form 3800

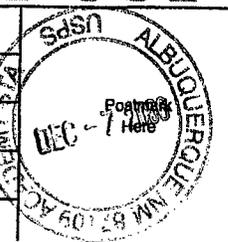
7006 2150 0004 1254 3455

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Certified Fee	2.40
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$ 2.79</b>



Sent To  
 Street, Apt. No., or PO Box No. Lisa R Robinson  
 503 Ginger St  
 City, State Bloomfield, NM 87403

PS Form

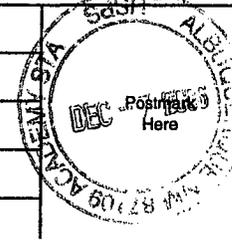
2462 4521 4000 1254 3448

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Postage	\$ 0.39
Certified Fee	2.40
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$ 2.79</b>



Sent To  
 Street, Apt. No., or PO Box No. Brett S Sharrard  
 PO Box 84  
 City, State, ZIP Durrango, CO 81302

PS Form 3800

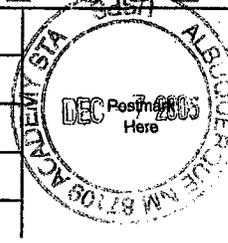
7006 2150 0004 1254 3431

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Postage	\$ 0.39
Certified Fee	2.40
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$ 2.79</b>



Sent To  
 Street, Apt. No., or PO Box No. Victor and Joan Trujillo  
 3121 Rosalind LP  
 City, State, ZIP Anchorage, AK 99507

PS Form 3800

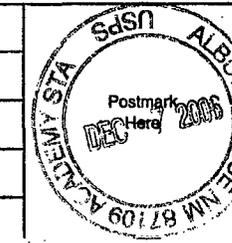
2462 4521 4000 1254 3271

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Postage	\$ 0.39
Certified Fee	2.40
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$ 2.79</b>



Sent To  
 Street, Apt. No., or PO Box No. Jack and Patricia Justice  
 PO Box 2122  
 City, State, ZIP+4 Bloomfield, NM 87413-2112

PS Form 3800

Neighboring Land Owners

7006 2150 0004 1254 3424

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Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
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Sent To  
 Frederick and Rae Moeller  
 2720 N Bennett St  
 Durango, CO 81301

PS Form 3800



7006 2150 0004 1254 3417

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Postage	\$ 0.39
Certified Fee	2.40
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$ 2.79</b>

Sent To  
 Tracy L Gutierrez  
 1406 Saiz Ln., Apt. 11B  
 Bloomfield, NM 87413-5015

PS Form 3800, A



7006 2150 0004 1254 3400

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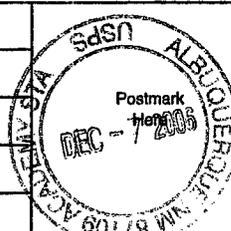
For delivery information visit our website at [www.usps.com](http://www.usps.com)

**OFFICIAL USE**

Postage	\$ 0.39
Certified Fee	2.40
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$ 2.79</b>

Sent To  
 Robert O Gutierrez  
 1302 Pixley  
 Bloomfield, NM 87413

PS Form 3800



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Postage	\$ 0.39
Certified Fee	2.40
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	<del>2.79</del>
<b>Total Postage &amp; Fees</b>	<b>\$ 2.79</b>

Sent To  
 Ruth Marie Cooper Trust Et Al  
 PO Box 325  
 Seward, NE 68434

PS Form 3800



7006 2150 0004 1254 3264

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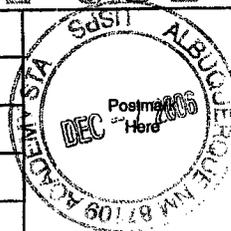
For delivery information visit our website at [www.usps.com](http://www.usps.com)

**OFFICIAL USE**

Postage	\$ 0.39
Certified Fee	2.40
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$ 2.79</b>

Sent To  
 Gutierrez Irrevocable Trust  
 C/O Felipe Gutierrez  
 818 Cholla  
 Bloomfield NM, 87413

PS Form 3800



7006 2150 0004 1254 3257

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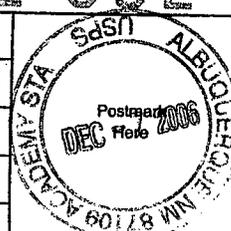
For delivery information visit our website at [www.usps.com](http://www.usps.com)

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Postage	\$ 0.39
Certified Fee	2.40
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$ 2.79</b>

Sent To  
 Merejildo C Martinez Et Ux  
 10 CR 5316  
 Bloomfield, NM 87413-9724

PS Form 3800



Neighboring Land Owners

7006 2150 0004 1254 3240

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Certified Fee	2.40
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$ 2.79</b>



Sent To  
 Street, Apt. or PO Box # **Felipe A and Mattie K Estrada**  
**818 Cholla**  
 City, State, ZIP **Bloomfield, NM 87413**

PS Form 38

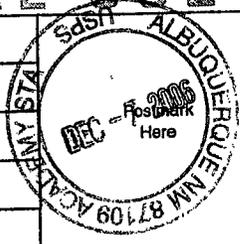
7006 2150 0004 1254 3233

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Certified Fee	2.40
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$ 2.79</b>



Sent To  
 Street, Apt. or PO Box # **Margaret L Gutierrez**  
**PO Box 1042**  
 City, State, ZIP **Bloomfield, NM 87417-1042**

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Certified Fee	2.40
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$ 2.79</b>



Sent To  
 Street, Apt. or PO Box # **Archie M Gutierrez**  
**1300 N Pixley St**  
 City, State, ZIP **Bloomfield, NM 87413-015**

PS Form 38

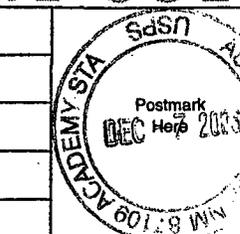
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Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$ 2.79</b>



Sent To  
 Street, Apt. or PO Box # **Anne M Ortega**  
**PO Box 1873**  
 City, State, ZIP **Bloomfield, NM 87413-1873**

PS Form 38

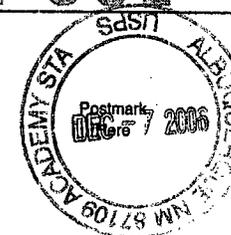
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Certified Fee	2.40
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$ 2.79</b>



Sent To  
 Street, Apt. No. or PO Box No. **Mike Jones Et Al**  
**PO Box 1873**  
 City, State, ZIP **Bloomfield, NM 87413-1873**

PS Form 3800

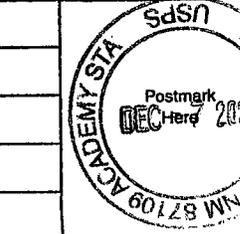
7006 2150 0004 1254 3189

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Certified Fee	2.40
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$ 2.79</b>



Sent To  
 Street, Apt. No. or PO Box No. **Bureau of Land Management**  
**1235 La Plata Highway**  
 City, State, ZIP **Farmington, NM 87401**

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Certified Fee	2.40
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$ 2.79</b>

*Sds/1*  
 ACADEMY STA NM 87109  
 Postmark Here  
 DEC - 7 2005

**Sent To**  
 Glen and Leslie Murray  
 C/O Raul Lopez  
 PO Box 4  
 Bloomfield, NM 87413-0004

PS Form 3800

7006 2150 0004 1254 3387

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Certified Fee	2.40
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$ 2.79</b>

*Sds/1*  
 ACADEMY STA NM 87109  
 Postmark Here  
 DEC - 7 2005

**Sent To**  
 Glen D Murray  
 Trustees  
 PO Box 2611  
 Farmington, NM 87499-2611

PS Form 3800

7006 2150 0004 1254 3353

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Postage	\$ 0.39
Certified Fee	2.40
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$ 2.79</b>

*Sds/1*  
 ACADEMY STA NM 87109  
 Postmark Here  
 DEC - 7 2005

**Sent To**  
 Jay Yoakum  
 PO Box 1925  
 Bloomfield, NM 87413-1925

PS Form 3800

7006 2150 0004 1254 3356

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Postage	\$ 0.39
Certified Fee	2.40
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$ 2.79</b>

*Sds/1*  
 ACADEMY STA NM 87109  
 Postmark Here  
 DEC - 7 2005

**Sent To**  
 Frances Rudicil  
 C/O Brooks Mers  
 PO Box 736  
 Bloomfield, NM 87413

PS Form 3800

7006 2150 0004 1254 3347

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Postage	\$ 0.39
Certified Fee	2.40
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$ 2.79</b>

*Sds/1*  
 ACADEMY STA NM 87109  
 Postmark Here  
 DEC - 7 2005

**Sent To**  
 Cecilia Campbell  
 PO Box 1659  
 Bloomfield, NM 87413-1659

PS Form 3800

7006 2150 0004 1254 3332

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Postage	\$ 0.39
Certified Fee	2.40
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
<b>Total Postage &amp; Fees</b>	<b>\$ 2.79</b>

*Sds/1*  
 ACADEMY STA NM 87109  
 Postmark Here  
 DEC - 7 2005

**Sent To**  
 Andrew and Janice Hefner  
 PO Box 2171  
 Farmington, NM 87499-2171

PS Form 3800

Neighboring Land Owners

7006 2150 0004 1254 3325

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Postage \$ 0.39  
 Certified Fee 2.40  
 Return Receipt Fee (Endorsement Required)  
 Restricted Delivery Fee (Endorsement Required)  
 Total Postage & Fees \$ 2.79



Sent To  
 Rita Duran  
 PO Box 2022  
 Bloomfield, NM 87413-2022

PS Form 3800

7006 2150 0004 1254 3316

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Postage \$ 0.39  
 Certified Fee 2.40  
 Return Receipt Fee (Endorsement Required)  
 Restricted Delivery Fee (Endorsement Required)  
 Total Postage & Fees \$ 2.79



Sent To  
 City of Farmington  
 800 Municipal Dr  
 Farmington, NM 87401-2663

PS Form 3800

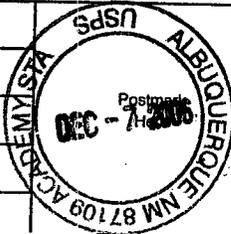
7006 2150 0004 1254 3301

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Postage \$ 0.39  
 Certified Fee 2.40  
 Return Receipt Fee (Endorsement Required)  
 Restricted Delivery Fee (Endorsement Required)  
 Total Postage & Fees \$ 2.79



Sent To  
 Public Service Company of New Mexico  
 Mail Stop 2101  
 Albuquerque, NM 87158

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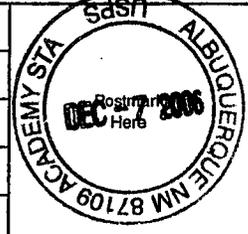
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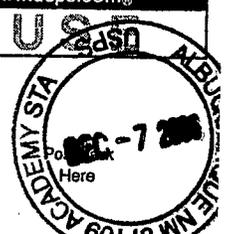
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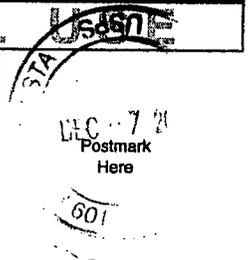
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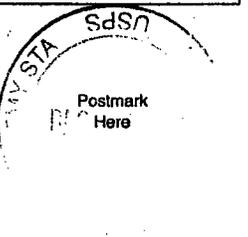
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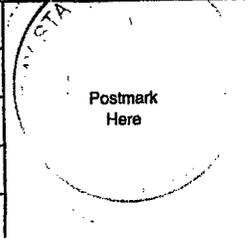
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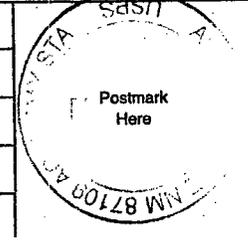
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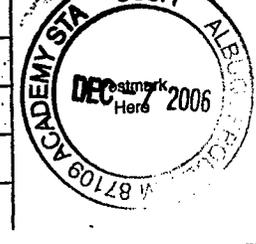
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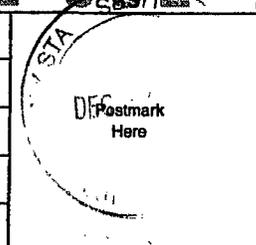
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**PO Box 1087**  
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2. Article Number

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*Thomas Bar*

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C. Date of Delivery

12/11

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out," said the 48-year-old assembly worker from Detroit. "I get 85 percent of my pay, stay at home for two years, and then get full retirement."

Ford is also offering packages to 10,000 white-collar workers, with further unspecified reductions in 2009. The company said the reductions will bring manufacturing capacity more in line with lower demand and allow the company to become more competitive.

## NOTICE OF PUBLICATION

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

(GW-035) - ConocoPhillips, Inc.; Beverly Cox, Compliance Coordinator, 61 County Road 4900, Bloomfield, New Mexico 87413, has submitted an application for renewal of their previously approved discharge plan for the San Juan Basin Gas Plant located in the NW/4 of Section 14, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. Approximately 790,950 gallons per month of waste water is 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. Ground water 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 in order to protect fresh water.

The New Mexico Oil Conservation Division will accept comments and statements of interest regarding this application and will create a facility-specific mailing list for persons who wish to receive future notices. Persons interested in obtaining further information, submitting comments or requesting to be on a facility-specific mailing list for future notices may contact:

Carl Chavez, CHMM  
 Environmental Bureau  
 New Mexico Oil Conservation Division  
 1220 South St. Francis Dr.  
 Santa Fe, New Mexico 87505  
 Office: (505) 476-3491

## NOTA DE PUBLICACION

Aviso es presentado conforme a la Comisión de Regulación de Control de Calidad de Agua de Nuevo México, un permiso para renovación de permiso para descarga ha sido sometido a el director de la Division de Conservacion de Petroleo, 1220 S. Saint Francis Drive, Santa Fe, Nuevo Mexico 87505, (505) 476-3440:

(GW-035) - ConocoPhillips, Inc.; Beverly Cox, Coordinador de Conformidad, 61 County Road 4900, Bloomfield, Nuevo Mexico 87413, a sometido una aplicacion para la renovacion de el permiso aprobado previamente para un plan de descarga para la Planta de Gas localizada en la esquina noroeste de la Seccion 14, municipio 29 al norte, gama 11 al oeste, NMPM, Condado de San Juan, Nuevo Mexico. Aproximadamente 790,950 galones pro mes de desecho de agua seran descargados en el sitio en un tanque cubierto localizado sobre la tierra y en dos charcas de superficie de evaporacion doble forradas con descubrimiento do salgase antes do transportar a una facilidad de disposicion aprobada por OCD. Agua mas probable de ser afectada por derrames accidentales sera de una profundidad de aproximadamente 15 a 55 pies con un total de solidos disueltos con concentracion de aproximadamente 4,400 mg/L. El plan de descarga consiste de una descripcion de como derrames accidentales a la superficie seran manajados para proteger la agua fresca.

La Division de Conservacion de Petroleo de Nuevo Mexico (New Mexico Oil Conservation Division) aceptara comentarios y declaraciones de interes y crea una lista especifica a la facilidad para personas deseando recibir noticias futuras por correo. Personas interesadas en obtener informacion futura o deseando ser puesto en una lista especifica para recibir noticias futuras por correo deben ponerse en contacto con:

Sr. Carl Chavez,, CHMM  
 Environmental Bureau  
 New Mexico Oil Conservation Division  
 1220 South St. Francis Dr.  
 Santa Fe, New Mexico 87505  
 Oficina: (505) 476-3491

return to profitability by 2009. But McTevia said Ford faces stiff competition from companies on much stronger financial footing.

Ford's share of the domestic market has declined from around 26 percent in the early 1990s to 17.6 percent at the end of October. In July, Ford sold fewer vehicles in the U.S. than Toyota Motor Corp. for the first time, but Ford's U.S. sales have surpassed the Japanese company since then.

Pete Hastings, vice president of corporate fixed income at Morgan Keegan in Memphis, Tenn., said the buyout announcement "represents one step among many on a long road" to Ford's turnaround. He said the automaker still must address its lost market share and structural costs when it renegotiates with the United Auto Workers next fall.

"They'll probably need another round of restructuring to adjust to the lower capacity from falling market share," Hastings said.

"They face tremendous challenges. It's going to be tough for them to achieve the turnaround. It's certainly a multiyear process, and I'm sure we'll see plenty of changes in the upcoming months."

As for the current round of buyouts, while workers can change their minds and back out of the deals, company officials predicted only a single-digit percentage would do so before their package takes effect.

Those who accepted the buyout packages will begin to leave the company in January, with the window open until Sept. 1, 2007, the company said.

At the Ford Rouge plant in Dearborn, on Wednesday, Vivian Davis said she's thrilled to be among those taking an early retirement incentive.

"I was two years away anyway, so this is just helping me

—By Sven Gustafson —  
 The Associated Press

**DETROIT** — Ford's hourly work force is shrinking to half its current size, following the announcement Wednesday that 38,000 hourly workers have agreed to accept early retirement or buyout packages this year.

That still might not be enough to revive the nation's second-largest automaker, however, which is contracting in the face of multibillion-dollar losses and fierce competition. Now, say analysts, Ford Motor Co. needs to rekindle interest in its cars and reclaim some market share lost to Asian rivals.

"They've got to learn how to build a product that is acceptable in the market at a good price," Turnaround specialist Jim McTevia, of McTevia & Associates in Bingham Farms, said. "They've got to build it economically and they've got to sell it economically."

Ford had expected 25,000 to 30,000 workers to sign up during an open enrollment period that expired Monday. The new reduction figure would amount to nearly 46 percent of the 83,000 unionized employees that Ford had at the start of the year.

That will eventually save Ford about \$5 billion a year, but it still has a long way to go and more painful measures to take before it's financially sound.

Ford lost \$7 billion in the first nine months of the year. And it is losing money on a daily basis. The Dearborn-based automaker said Wednesday it expects to burn through \$17 billion in cash from 2007 to 2009.

On Monday, it announced plans to mortgage its assets and raise about \$18 billion in financing to pay for its restructuring.

McTevia said that move and the buyout figures signal that the automaker believes it will be able to operate profitably in the future. Ford has said it expects to

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sole the victims' relatives.

Union officials have suggested that the fourth man could have fled with a gun. A scenario investigators haven't ruled out.

According to an undercover officer, the other witness — the man in black — argued with Bell and his companions as they exited a Queen strip club where Bell was having a bachelor party. The officer was part of a vice team investigating complaints about prostitution and drug dealing at the club.

The man, while in front of a black SUV parked outside the club, reached into his pocket as if he had a weapon as Bell chal-

lenged him. He also claims he spotted Guzman, the driver in the passenger seat, make a sudden move for his husband before he and four other officers fired.

The third victim, Trent Benefield, told police in a brief interview at the hospital that there was never a fourth person. He also claimed Bell became spooked and tried to take off because he didn't know the undercover was a police officer.

But the shooting detective insists that the group he followed numbered four, and that at some point he saw the fourth man run away from the car and disappear into the night.

"There was a fourth person involved — no doubt," his attorney, Philip Karasyk, said Wednesday.

Another witness seems to back the account: She has told police she looked out the window of her nearby home after hearing gunfire, and spotted someone running away from the direction of the shooting scene. She too described a man wearing a beige jacket, the officials said.

On Tuesday, a team of officers searched for fresh evidence near the shooting scene underneath an airport terminal. Based on a tip that a man had ditched a

weapon there, the law enforcement officials said.

Meanwhile, law enforcement officials close to the case said prosecutors are waiting to examine 911 calls, police radio communications and ballistic reports, which could determine the origin of the deadly shots. Despite a clamor for answers about what happened, the official said it is a complex investigation that requires thoroughness.

All five officers were placed on paid administrative leave while the Queens District Attorney's officer pursues possible criminal charges.

Guzman, 31, shot at least 11 times, and Benefield, 23, hit three times, have remained hospitalized.

The community outrage over the shooting was evident Wednesday in signs taped up on a brick wall of an auto body shop near the shuttered strip club. "Death to Police Brutality and Murder," said one hand-printed sign. "Off the Pigs Who Shoot Our Kids," said another.

A flower wreath on an easel showed a photo of the 23-year-old Bell, his fiance and one of their young daughters, with the words: "Love Yourself, Stop the Violence."

## Tribe holds beach access as leverage for more land in negotiations

— By Rachel La Corne —  
The Associated Press

**LA PUSH.** Wash. — The small Quileute Indian reservation sits on a shoreline of storm-tossed driftwood and pebble beaches, with dramatic views of rock formations rising out of the Pacific Ocean.

But the same ocean that crashes daily on these beaches is at the center of a long-simmering boundary battle between the tribe and the National Park Service.

The tribe has closed public access to one beach, and threatens to close another if members don't get additional land on higher ground, fearing the sea will sweep away the tribe's lower village.

**Whedding and dealing.** The tribe has offered a land swap — it will hand over eight acres of disputed land at Rialto Beach and reopen access to Second Beach if the park cedes — or buys for the tribe — enough land to more than double the size of the reservation.

"We don't have anything against the public," said James Jaime, the tribe's executive director. "It was the only way to get the federal government's attention."

The reservation is bounded on one side by the ocean and three sides by Olympic National Park. The tribe wants to move its school, senior center, tribal offices and some housing to higher ground as well as expand its reservation to build more housing developments.

"Our primary concern is the health, safety and welfare of not only the tribal members, but the entire community," said Jaime.

Tribal leaders originally sought 1,200 acres, but are now asking for about 800 acres to add to their one square mile reservation — 309 acres of park land and another 490 acres of private land that it wants the National Park Service to purchase for them.

**A history of dispute.** The Quileute reservation was established in 1889 at the mouth of the Quillayute River, Olympic

National Park has bordered the reservation since 1953.

The tribe and the park have been debating the boundary at Rialto Beach for decades. The tribe argues that it owns most of Rialto Beach, but the park has built a parking lot and a restroom at the edge of the beach and both sides are disputing eight acres of land there.

The dispute came to a head last year after a tribal member was cited for collecting firewood near the disputed boundary. While charges were ultimately dropped, Jaime said that the tribe needed to take action.

To get the government's attention, the tribe closed off access to one of the most beautiful sections of Washington state's Pacific shore. Second Beach, in October 2005. The beach is public, but the parking lot and access to the trail to the beach is on tribal ground.

Olympic National Park Superintendent Bill Laitner said that the park wants to make sure the tribe can move people out of the danger zone. Of the more than 700 members of the tribe

350 live on the reservation — 250 in the flood zone.

"We feel that is of utmost importance," he said. "We believe we can do that. We don't believe we can solve all of the tribes' problems for all time."

**Stalemate.** After several meetings, the two sides remain at an impasse, and the tribe said that it's ready to raise the ante. The park service has offered 274 acres of park land.

"If there are no improvements to this offer and we do not resolve this issue, Rialto Beach will be closed next year," Jaime said.

Laitner said that while closing the beach would be inconvenient for park visitors, it would also be "devastating to the local economy" of the tribe.

"I don't think the tribe wants that," he said.

In October, the Quileute Tribe had a reservation-wide tsunami drill with a complete evacuation of the lower village, getting everyone to high ground in nine minutes — the amount of time

tribal leaders have determined is necessary to prevent loss of life. The last time a tsunami hit the area was 1964.

"What I fear the most is at 3 o'clock in the morning, when we are all sleeping and not prepared," Jaime said. "Our exercises, our drills, they're structured, they're choreographed. It's the real event that's going to be unpredictable."

Any change in the boundary would have to be approved by Congress, but Rep. Norm Dicks said he worries that if the tribe doesn't accept the current offer, they may end up with nothing.

"We're all concerned about the safety of the tribe and the possibility of a tsunami," he said. "The tribe has to realize that they are running a risk by not accepting this offer."

## Ford says 38,000 have accepted buyout offers or early retirement

— By Sven Gustafson —  
The Associated Press

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"They'll probably need another round of restructuring to adjust to the lower capacity from falling market share," Hastings said.

"They face tremendous challenges. It's going to be tough for them to achieve the turnaround. It's certainly a multi-year process and I'm sure we'll see plenty of changes in the upcoming months."

As for the current round of buyouts, while workers can change their minds and back out of the deals, company officials predicted only a single-digit percentage would do so before their package takes effect.

Those who accepted the buyout packages will begin to leave the company in January, with the window open until Sept. 1, 2007, the company said.

At the Ford Rouge plant in Dearborn, on Wednesday, Vivian Davis said she's thrilled to be among those taking an early retirement incentive.

"I was two years away anyway, so this is just helping me

out," said the 43-year-old assembly worker from Detroit. "I get 85 percent of my pay, stay home for two years, and then get full retirement."

Ford is also offering packages to 10,000 white-collar workers

with further unspecified reductions in 2009. The company said the reductions will bring manufacturing capacity more in line with lower demand and allow the company to become more competitive.

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MAKING SENSE OF INVESTING

**NOTICE OF PUBLICATION**

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

(GW-035) ConocoPhillips, Inc., Beverly Cox, Compliance Coordinator, 61 County Road 4900, Bloomfield, New Mexico 87413, has submitted an application for renewal of their previously approved discharge plan for the San Juan Basin Gas Plant located in the NW/4 of Section 14, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. Approximately 790,950 gallons per month of waste water is discharged onsite into an above ground banded, closed top tank and two double lined, surface evaporation ponds with leak detection probe. Transport offsite at an approved OGD disposal facility. Ground water 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 in order to protect fresh water.

The New Mexico Oil Conservation Division will accept comments and statements of interest regarding this application and will create a facility-specific mailing list for persons who wish to receive future notices. Persons interested in obtaining further information, submitting comments or requesting to be on a facility-specific mailing list for future notices may contact:

Carl Chavez, CHMM  
Environmental Bureau  
New Mexico Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, New Mexico 87505  
Office: (505) 476-3491

**NOTA DE PUBLICACIÓN**

Aviso es presentado conforme a la Comisión de Regulación de Control de Calidad de Agua de Nuevo México, un permiso para renovación de permiso para descarga ha sido sometido a el director de la División de Conservación de Petróleo, 1220 S. Saint Francis Drive, Santa Fe, Nuevo México 87505, (505) 476-3440.

(GW-035) ConocoPhillips, Inc., Beverly Cox, Coordinador de Conformidad, 61 County Road 4900, Bloomfield, Nuevo México 87413, a sometido una aplicación para la renovación de el permiso aprobado previamente para un plan de descarga para la Planta de Gas localizada en la esquina noroeste de la Sección 14, municipio 29 al norte, gama 11 al oeste, NMPM, Condado de San Juan, Nuevo México. Aproximadamente 790,950 galones por mes de desecho de agua son descargados en el sitio en un tanque cubierto localizado sobre la tierra y en dos charcos de superficie de evaporación doble forradas con descubrimiento de spillages antes de transportar a una facilidad de disposición aprobada por OGD. Agua más probable de ser afectada por derrames accidentales será de una profundidad de aproximadamente 15 a 55 pies con un total de sólidos disueltos con concentración de aproximadamente 4,400 mg/L. El plan de descarga consiste de una descripción de cómo derrames accidentales a la superficie serán manejados para proteger la agua fresca.

La División de Conservación de Petróleo de Nuevo México (New Mexico Oil Conservation Division) aceptará comentarios y declaraciones de interés y creará una lista específica a la facilidad para personas deseando recibir noticias futuras por correo. Personas interesadas en obtener información futura, o deseando ser puesto en una lista, específica para recibir noticias futuras por correo deben ponerse en contacto con:

Sr. Carl Chavez, CHMM  
Environmental Bureau  
New Mexico Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, New Mexico 87505  
Oficina: (505) 476-3491

**nationbriefs**

**ILLINOIS**

**Court rules governor can be free during appeal**

CHICAGO (AP) — Former Gov. George Ryan can remain free while he appeals his conviction in the corruption scandal that ruined his political career, a federal appeals court has ruled.

The decision by the 7th U.S. Circuit Court of Appeals was issued without explanation Tuesday, but the court said if it upholds Ryan's conviction, he must go to prison immediately.

Ryan, 72, was sentenced in September to 6 1/2 years in federal prison for racketeering and fraud involving corruption when he was secretary of state in the 1990s and later governor.

U.S. District Judge Rebecca L. Pallmeyer had refused to grant bail to Ryan. But the appeals court overruled her and said Ryan may remain free while appealing his conviction. He had been due to report to prison Jan. 4.

Federal prosecutors opposed bail for Ryan, saying it was unlikely his conviction would be overturned. But Ryan's attorneys argued that jury deliberations in the case were flawed and that Ryan should be granted a new trial.

Ryan was convicted in April of steering lucrative state contracts and leases to lobbyists and friends; using state employees and tax dollars to operate his political campaigns; and sabotaging an investigation of driver's license bribery.

A spokesman for the U.S. attorney's office, Randall Samborn, said Wednesday the government had no comment on the appeals court's decision.

**GEORGIA**

**Airport security badges found on illegal immigrants**

ATLANTA (AP) — Federal authorities said Wednesday they arrested six illegal immigrants who had security badges that gave them access to the tarmac and other restricted areas at Hartsfield-Jackson Atlanta International Airport.

U.S. Immigration and Customs Enforcement agents arrested the men, all Mexicans employed by T.C. Drywall Inc., as they reported to work at the airport Wednesday, agency spokesman Marc Raimondi said.

Immigration officials said the men had been hired recently to install drywall inside the airport's secure area. They will appear before an immigration judge and face deportation to Mexico.

Immigration officials do not believe the men posed a specific threat, but were concerned that undocumented immigrants had access to a secure area, said Kenneth Smith, special agent-in-charge of the ICE Office of Investigations in Atlanta.

"ICE is aggressively pursuing illegal aliens at the places where they work," Smith said. "Areas of critical infrastructure, such as airports, are especially important to national security."

Officials at the Atlanta airport, the world's busiest in terms of passengers, didn't immediately return messages seeking comment Wednesday. A message left on Alpharetta-based T.C. Drywall's voicemail also was not immediately returned.

Since March 2003, immigration agents have conducted operations at about 200 U.S. airports and audited nearly 6,000 businesses. The effort has identified more than 5,800 unauthorized airport workers

**N.Y. shooting probe looks for mysterious**

— By Tom Hays —  
The Associated Press

NEW YORK — Investigators believe two mysterious men — one of whom may have had a gun — could hold the key to learning why police unleashed a 50-bullet barrage that killed a groom leaving his bachelor party at a strip club hours before his wedding.

One man was last seen dressed in black, standing in front of a sport utility vehicle with silver rims and exchanging glares and insults with the groom, Sean Bell. Another man was last seen wearing a beige jacket and running away from Bell's car as five officers fired.

Law enforcement officials provided partial descriptions Wednesday of the two missing witnesses and details about their possible roles based on accounts from undercover officers and at least one civilian.

The shooting has ignited outrage in New York, and civil rights activists Jesse Jackson and Al Sharpton visited the scene of the shooting Wednesday to console the victims' relatives.

Union officials have suggested that the fourth man could have fled with a gun — a scenario investigators haven't ruled out.

According to an undercover officer, the other witness — the man in black — argued with Bell and his companions as they exited a Queen strip club where Bell was having a bachelor party. The officer was part of a vice team investigating complaints about prostitution and drug dealing at the club.

The man, while in front of a black SUV parked outside the club, reached into his pocket as if he had a weapon as Bell chal-

lenged him to a fight and one of Bell's companions, Joseph Guzman, said, "Yo, get my gun. Get my gun," according to the officials, citing the undercover detective's account. The officials spoke to *The Associated Press* on condition of anonymity because the investigation has not been completed.

The officials said the exchange prompted a second undercover detective to follow Bell and three other men as they walked away toward their car, apparently suspecting the men meant to arm themselves and attack the man in black.

The first undercover officer said he lost sight of the group — including the fourth man he described as wearing a beige jacket — as they rounded a corner with the second undercover trailing them on foot. Moments later, the second undercover started shooting at the car when Bell, while trying to drive away, bumped him and smashed into an unmarked police van.

Through his lawyer, the detective has insisted that he clearly identified himself as a police officer as he tried to stop them. He also claims he spotted Guzman, then sitting in the passenger seat, make a sudden move for his waistband before he and four other officers fired.

The third victim, Trent Benefield, told police in a brief interview at the hospital that there was never a fourth person. He also claimed Bell became spooked and tried to take off because he didn't know the undercover was a police officer.

But the shooting detective insists that the group he followed numbered four, and that at some point he saw the fourth man run away from the car and disappear into the night.



A photo of Sean Bell with his fiancée, Nicole Paultra, and one of his children at a memorial at the scene of his shooting in the Queens borough of New York.

"There was a fourth person involved — no doubt," his attorney, Philip Karasyk, said Wednesday.

Another witness seems to back the account: She has told police she looked out the window of her nearby home after hearing gunfire and spotted someone running away from the direction of the shooting scene. She too described a man wearing a beige jacket, the officials said.

On Tuesday, a team of officers searched for fresh evidence near the shooting scene underneath an airport monorail, based on a tip that a man had ditched a

weapon there, the law enforcement officials said.

Meanwhile, a law enforcement official close to the case said prosecutors are waiting to examine 911 calls, police radio communications and ballistic reports, which could determine the origin of the deadly shots. Despite a clamor for answers about what happened, the official said it is a complex investigation that requires thoroughness.

All five officers were placed on paid administrative leave while the Queens District Attorney's officer pursues possible criminal charges.

Guzman, three times hospitalized.

The shooting at a brick shop in club. "I and M printed Shoot (C) A fl

showed old Bel their yo. Violence

**Tribe holds beach access as leverage for more land in ne**

— By Rachel La Corte —  
The Associated Press

LA PUSH, Wash. — The small Quileute Indian reservation sits on a shoreline of storm-tossed driftwood and pebble beaches, with dramatic views of rock formations rising out of the Pacific Ocean.

But the same ocean that crashes daily on these beaches is at the center of a long-simmering boundary battle between the tribe and the National Park Service.

The tribe has closed public access to one beach, and threatens to close another if members don't get additional land on higher ground, fearing the sea will sweep away the tribe's lower village.

**Wheeling and dealing**

The tribe has offered a land swap — it will hand over eight acres of disputed land at Rialto Beach and reopen access to Second Beach if the park cedes — or buys for the tribe — enough land to more than double the size of the reservation.

**A history of dispute**

The Quileute reservation was established in 1889 at the mouth of the Quillayute River; Olympic

"We don't have anything against the public," said James Jaime, the tribe's executive director. "It was the only way to get the federal government's attention."

The reservation is bounded on one side by the ocean and three sides by Olympic National Park. The tribe wants to move its school, senior center, tribal offices and some housing to higher ground as well as expand its reservation to build more housing developments.

"Our primary concern is the health, safety and welfare of not only the tribal members, but the entire community," said Jaime.

Tribal leaders originally sought 1,200 acres, but are now asking for about 800 acres to add to their one square mile reservation — 309 acres of park lands, and another 480 acres of private land that it wants the National Park Service to purchase for them.

The Quileute reservation was established in 1889 at the mouth of the Quillayute River; Olympic

National Park has bordered the reservation since 1953.

The tribe and the park have been debating the boundary at Rialto Beach for decades. The tribe argues that it owns most of Rialto Beach, but the park has built a parking lot and a restroom at the edge of the beach and both sides are disputing eight acres of land there.

The dispute came to a head last year after a tribal member was cited for collecting firewood near the disputed boundary. While charges were ultimately dropped, Jaime said that the tribe needed to take action.

To get the government's attention, the tribe closed off access to one of the most beautiful sections of Washington state's Pacific shore, Second Beach, in October 2005. The beach is public, but the parking lot and access to the trail to the beach is on tribal ground.

Olympic National Park Superintendent Bill Laitner said that the park wants to make sure the tribe can move people out of the danger zone. Of the more than 700 members of the tribe,

350 live on the reservation — 250 in the flood zone.

"We feel that is of utmost importance," he said. "We believe we can do that. We don't believe we can solve all of the tribes' problems for all time."

**Stalemate**

After several meetings, the two sides remain at an impasse, and the tribe said that it's ready to raise the ante. The park service has offered 274 acres of park land.

"If there are no improvements to this offer and we do not resolve this issue, Rialto Beach will be closed next year," Jaime said.

Laitner said that while closing the beach would be inconvenient for park visitors, it would also be "devastating to the local economy" of the tribe.

"I don't think the tribe wants that," he said.

In October, the Quileute Tribe had a reservation-wide tsunami drill with a complete evacuation of the lower village, getting everyone to high ground in nine minutes — the amount of time

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**Ford says 38,000 have accepted buyout offers or early retirement**

— By Sven Gustafson —  
The Associated Press

DETROIT — Ford's hourly work force is shrinking to half its current size, following the announcement Wednesday that 38,000 hourly workers have agreed to accept early retirement or buyout packages this year.

That still might not be enough to revive the nation's second-largest automaker, however, which is contracting in the face of multibillion-dollar losses and fierce competition. Now, say analysts, Ford Motor Co. needs to rekindle interest in its cars and

return to profitability by 2009. But McTevia said Ford faces stiff competition from companies on much stronger financial footing.

Ford's share of the domestic market has declined from around 26 percent in the early 1990s to 17.6 percent at the end of October. In July, Ford sold fewer vehicles in the U.S. than Toyota Motor Corp. for the first time, but Ford's U.S. sales have surpassed the Japanese company since then.

Pete Hastings, vice president of corporate fixed income at Morgan Keegan in Memphis,

out," said the 48-year-old assembly worker from Detroit. "I get 85 percent of my pay, stay at home for two years, and then get full retirement."

Ford is also offering packages to 10,000 white-collar workers,

with further unspecified reductions in 2009. The company said the reductions will bring manufacturing capacity more in line with lower demand and allow the company to become more competitive.

**NOTICE OF PUBLICATION**

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regs. permit renewals has been submitted to the Director of the Oil Conservation Division, 1220 S. E. New Mexico 87505, Telephone (505) 476-3440:

(GW-035) - ConocoPhillips, Inc., Beverly Cox, Compliance Coordinator, 61 County Road 4900 87413, has submitted an application for renewal of their previously approved discharge plan to Plant located in the NW/4 NW/4 of Section 14, Township 29 North, Range 11 West, NMPM Mexico. Approximately 790,850 gallons per month of waste water is discharged onsite into a closed top tank and two double lined surface evaporation ponds with leak detection prior

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**Chavez, Carl J, EMNRD**

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**From:** Cox, Beverly J. [Beverly.J.Cox@conocophillips.com]  
**Sent:** Wednesday, December 13, 2006 2:23 PM  
**To:** Price, Wayne, EMNRD  
**Cc:** Chavez, Carl J, EMNRD; Colomb, F.P. Micky; Kinard, Todd A.; Ayers, G. Lane; Cox, Beverly J.  
**Subject:** San Juan Gas Plant GWDP (GW- 035)

Mr. Price,

As per your request, ConocoPhillips is sending you the comments for the San Juan Gas Plant Ground Water Discharge Permit (GW-035) Approval Conditions. We have taken the conditions and re-wrote them into a MS Word document so that we can type in our comments. The comments are from a previous conversation with Mr. Carl Chavez. Our comments are in blue type.

Please be advised, that due to some of the retrofit requirements prior to the discharge permit renewal, the San Juan Gas Plant will request an extension to the approval conditions.

Should you have questions, please call me at 505-863-1023 or Mr. Todd Kinard at 505-632-4954 or Mr. Micky Colomb at 505-632-4905. Please be advised that I will be on vacation from December 21-31, 2006. I will have my cell phone with me but not my computer. My cell phone is 505-870-9839.

Thanks very much,

Beverly Cox

<<Discharge Permit Condition Remarks.doc>>

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, than 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 reasonable 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.

*ConocoPhillips understands this section to notify the OCD should an expansion of the plant be made that potentially affects the discharge of water or alter the approved volumes outlined in the permit renewal.*

**6. Waste disposal and Storage:** The owner/operator shall dispose of all wastes at and 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.

*ConocoPhillips understands that the OCD should be notified if a temporary tank will be brought into the facility to collect waste. This would occur during a special project ie., tank/vessel cleaning. Potential waste streams that would occur involving the use of a temporary tank is listed under section VII, Source and Quantities of Effluent and Process Fluids, of the renewal application. This waste disposal would be on a case by case basis.*

**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 Area:** 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.

*Based off the conversation with Mr. Carl Chavez on December 8, 2006, ConocoPhillips understood that we could replace an existing tank that has an unlined bermed area with a double hull tank that has leak detection designed into the tank. This tank would not have to be bermed because of the leak detection of the double hull tank. Mr. Chavez's email dated December 8, 2006 countered our discussion and now states that this will not be allowed. (the double hull tank with leak detection will still have to have an impermeable containment that is 1-1/3 times the capacity of the tank).*

*ConocoPhillips request an extension on the retro fit requirements' of this condition. The replacement of an existing tank to a double hull tank was planned for the first half of 2007. If the replacement of the existing tank with a double hull tank with leak detection is not adequate then ConocoPhillips will need to address the earthen containment. The current containment around the existing tank is of earthen clay materials and not impermeable and we would need time to design a liner for the bermed area. This project would not be completed prior to the permit renewal.*

**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 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 foreseeable future. The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal.

*The evaporation ponds at the San Juan Gas plant are of a design that is lined and has leak detection. The rain water retention pond is of earthen clay materials and historically has not been a issue*

*ConocoPhillips request that this retention pond remain as is and not be retrofitted with secondary containment and leak detection. General description, Section X(C, )of the permit renewal packet discuss the procedures for containment of precipitation and runoff.*

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.

*The previous permits have existed with the original exemption of screened or netting of the evaporation pond and rain water runoff pond. ConocoPhillips request this exemption to remain. This exemption letter can be found under tab "1" of the renewal packet.*

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 with 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/Waste Water Lines:**

A. The owner operator shall test all underground process/waste water 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 minimum of 30 minutes with no more than 1% loss/gain in pressure. The owner/operator may use other methods for testing if approved by the OCD.

*ConocoPhillips would like to see the term "process/wastewater" written as "process/waste water". We feel that a complete different interpretation could be taken for the word process should the existing language remain. This language should be consistent throughout the document.*

B. The owner/operator shall maintain underground process/waste water 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 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 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 processor 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 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.

*Part "B" should be removed. This is covered in the permit renewal packet under section VII, #10 and Appendix F, line 44.*

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 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

Date \_\_\_\_\_

Title \_\_\_\_\_

**Chavez, Carl J, EMNRD**

---

**From:** Cox, Beverly J. [Beverly.J.Cox@conocophillips.com]  
**Sent:** Wednesday, December 13, 2006 8:23 AM  
**To:** Chavez, Carl J, EMNRD  
**Cc:** Cox, Beverly J.; Kinard, Todd A.; Colomb, F.P. Micky  
**Subject:** Migratory Bird Exemption (6W>097)

Mr. Chavez,

In our previous discussion you had requested that we seen a copy of the letter for the migratory bird exemption. I have this exemption attached to this email. You can also find the exemption under section "I" of the GWDP renewal booklet.

I am at the San Juan Gas Plant today. Should you have questions today, please email or call me at 505-632-4900 or my cell at 505-870-9839.

Thanks,

Beverly

<<Migratory Bird Exemption.pdf>>

Submit 4 Copies  
to Appropriate  
District Office

State of New Mexico  
Energy, Minerals and Natural Resources Department

Form O-134  
Aug. 1, 1989

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

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

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 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. 3

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 [Signature]

Approved by Denny Foust

Title Deputy oil and gas Inspector

Date 7/23/96

**Chavez, Carl J, EMNRD**

---

**From:** Chavez, Carl J, EMNRD  
**Sent:** Friday, December 08, 2006 11:45 AM  
**To:** 'Cox, Beverly J.'  
**Cc:** 'todd.a.kinard@conocophillips.com'; Price, Wayne, EMNRD  
**Subject:** San Juan Gas Plant (GW-035) Discharge Permit Renewal

Beverly:

After discussing sections of the draft permit or clarification items from our telephone conference call this morning with my Supervisor, Mr. Wayne Price, the OCD clarification of sections of the draft permit are as follows:

#9) Above Ground Tanks: The OCD allows subsurface double-hull containment tanks with leak detection to be exempt from the 1/3 volume provision of R711; however, it does not allow double-hull above ground tanks to be exempted. Consequently, the OCD recommends no changes to Section 9.

#11A) The OCD does not recommend any changes to this section because in the second sentence, "The owner/operator shall retrofit all existing systems without secondary containment and leak detection before discharge permit renewal. The intent of this section is to retrofit all existing systems without secondary containment and leak detection before the end of the permit renewal expiration date or 5-years.

#12A) The OCD does not recommend any changes to this section because PRC lines would be addressed or exempted to this provision by phrase in sentence one, "except lines containing fresh water or fluids that are gases at atmospheric temperature and pressure."

#12B) The OCD does not recommend any changes to this section as the meaning of "process/waste water" is considered to be generally understood by the oil and gas industry; however, you are welcome to speak to Mr. Wayne Price if you still disagree on the meaning of process and/or wastewater pipeline for diagrams, etc.

#20B) The OCD will remove this section, since the permit renewal includes sand blast media in its permit renewal application.

Please contact Mr. Wayne Price at (505) 476-3490 or me if you have questions or wish to communicate further in this matter. Thank you.

Carl J. Chavez, CHMM  
New Mexico Energy, Minerals & Natural Resources Dept.  
Oil Conservation Division, Environmental Bureau  
1220 South St. Francis Dr., Santa Fe, New Mexico 87505  
Office: (505) 476-3491  
Fax: (505) 476-3462  
E-mail: [CarlJ.Chavez@state.nm.us](mailto:CarlJ.Chavez@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/>  
(Pollution Prevention Guidance is under "Publications")

Carl

Tuesday December 5, 2006

I happened to be in Santa Fe and stopped by to discuss the Notice of Publication in the Farmington Daily Times (November 30, 2006) concerning the Conoco Phillips, Inc. application of renewal for the discharge plan for the San Juan Basin Gas Plant.

The San Juan Citizens Alliance, New Mexico Chapter, would like to attain all information concerning this application and plans on submitting comments for this facility.

When does the comment period end? 12/31/06  
Can we get a complete copy of the Discharge Plan?  
Thank you.

Thank you for your attention to this matter.

Mike Eisenfeld

San Juan Citizens Alliance

Farmington, New Mexico

505 360-8994



SAN JUAN  
ALLIANCE

Mike Eisenfeld  
New Mexico Staff Organizer

505.360.8994  
mike@sanjuancitizens.org  
www.sanjuancitizens.org

11/3/06 - 600 website  
11/17/06 - 1st print to website  
11/30/06 - Conoco poster

12/30/06 No Comment

**Chavez, Carl J, EMNRD**

---

**From:** Chavez, Carl J, EMNRD  
**Sent:** Thursday, December 07, 2006 10:50 AM  
**To:** 'mike@sanjuancitizens.org'  
**Cc:** 'Cox, Beverly J.'; 'todd.a.kinard@cononocphillips.com'  
**Subject:** San Juan Gas Plant Discharge Plan Renewal (GW-035)

Mr. Eisenfeld:

Good morning. I am in receipt of your hand delivered letter dated December 5, 2006 to the OCD regarding the Discharge Plan Permit renewal. Regarding your questions and in response to your questions, the OCD is responding with the following:

- 1) The public comment period ends December 30, 2006, since ConocoPhillips posted its Public Notice on November 30, 2006. The OCD posted the Public Notice on its website on around November 3, 2006. The Draft permit was then added to its website on about November 17, 2006. The OCD's Public Notice to the Farmington and Santa Fe Newspapers was published by the newspapers subsequent to the OCD's November 17, 2006 request for posting with the newspapers; and
- 2) You requested a copy of the draft discharge permit. Please find attached a copy of the current draft discharge permit for your comments.

Please contact me if you need further assistance in this matter. Thank you.

Carl J. Chavez, CHMM  
New Mexico Energy, Minerals & Natural Resources Dept.  
Oil Conservation Division, Environmental Bureau  
1220 South St. Francis Dr., Santa Fe, New Mexico 87505  
Office: (505) 476-3491  
Fax: (505) 476-3462  
E-mail: [CarlJ.Chavez@state.nm.us](mailto:CarlJ.Chavez@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/>  
(Pollution Prevention Guidance is under "Publications")

# Farmingington Daily Times Classified

NOV 23 2006  
1211 Conservator Drive  
1220 S. St. Francis Dr.  
Santa Fe, NM 87505

Date: 11/13/06

NM ENERGY, MINERALS & NATURA

NM ENERGY, MINERALS & NA  
1220 SOUTH ST. FRANCIS DR.  
SANTA FE, NM 87505  
(505) 476-3400

Ad#	Publication	Class	Start	Stop	Times	AS/400 Acct
1000519564	FARMINGTO	0152 - Legal Notices	11/08/2006	11/08/2006	1	780352
						Total Cost: \$109.95
						Payment: <u>\$0.00</u>
						Balance Due: \$109.95

TEXT:

NOTICE OF PUBLICATION STATE OF NEW MEXICO ENERGY, MINERALS AND NAT

*ok to pay  
cc*

Please include Ad number on your payment.

**AFFIDAVIT OF PUBLICATION**

**Ad No. 54192**

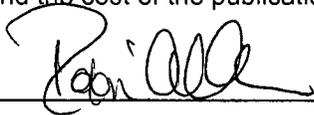
**STATE OF NEW MEXICO**  
**County of San Juan:**

**COPY OF PUBLICATION**

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

Wednesday, November 08, 2006

And the cost of the publication is \$109.95

  
\_\_\_\_\_

ON 11/22/06 ROBIN ALLISON appeared before me, whom I know personally to be the person who signed the above document.

  
My Commission Expires NOV 17, 2008

**NOTICE OF PUBLICATION**

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations (20.6.2.3106 NMAC), the following discharge permit application(s) has been submitted to the Director of the New Mexico Oil Conservation Division ("NMOCD"), 1220 S. Saint Francis Drive, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW-035) ConocoPhillips, Beverly Cox, Compliance Coordinator, 61 County Road 4900, P.O. Box 217, Bloomfield, New Mexico 87413 (Phone: (505) 863-1023), has submitted a discharge plan renewal application for the previously approved discharge plan for their San Juan Basin Gas Plant, located in the NW/4 of Section 14, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. Approximately 790,950 gallons per month of waste water is 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. Ground water 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 in order to protect fresh water.

The NMOCD has determined that the application is administratively complete. The NMOCD will accept comments and statements of interest regarding this application and will create a facility-specific mailing list for persons who wish to receive future notices. Persons interested in obtaining further information, submitting comments or requesting to be on a facility-specific mailing list for future notices may contact the Environmental Bureau Chief of the Oil Conservation Division at the address given above. The administrative completeness determination may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday, or may also be viewed at the NMOCD web site <http://www.emnr.d.state.nm.us/ocd/>.

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 3rd day of November 2006.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION  
Mark Fesmire, Director

Legal No. 54192, published in The Daily Times, Farmington, New Mexico on Wednesday, November 8, 2006

**Chavez, Carl J, EMNRD**

---

**From:** Chavez, Carl J, EMNRD  
**Sent:** Friday, November 03, 2006 2:09 PM  
**To:** 'Cox, Beverly J.'  
**Cc:** Price, Wayne, EMNRD; Perrin, Charlie, EMNRD  
**Subject:** ConocoPhillips San Juan Gas Plant Discharge Plan Renewal (GW-035)

Beverly Cox:

**Re: Discharge Plan Renewal Permit GW-035  
ConocoPhillips  
San Juan Basin Gas Plant  
San Juan County, New Mexico**

Dear Ms. Cox:

The New Mexico Oil Conservation Division (NMOCD) has received ConocoPhillips request and initial fee, dated October 25 2006, to renew GW-035 for the ConocoPhillips San Juan Basin Gas Plant located in the NW/4 NW/4 of Section 14, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. The initial submittal provided the required information in order to deem the application "administratively" complete. ConocoPhillips and the NMOCD are required to follow the attached public notice renewal requirements (see attachments).

Therefore, the New Mexico Water Quality Control Commission regulations (WQCC) notice requirements of 20.6.2.3108 NMAC must be satisfied and demonstrated to the NMOCD. NMOCD will provide public notice pursuant to the WQCC notice requirements of 20.6.2.3108 NMAC to determine if there is any public interest.

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3491 or [carlj.chavez@state.nm.us](mailto:carlj.chavez@state.nm.us). On behalf of the staff of the NMOCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Carl J. Chavez  
Environmental Engineer

CJC/cjc

xc: OCD District III Office, Aztec

Carl J. Chavez, CHMM  
New Mexico Energy, Minerals & Natural Resources Dept.  
Oil Conservation Division, Environmental Bureau  
1220 South St. Francis Dr., Santa Fe, New Mexico 87505  
Office: (505) 476-3491  
Fax: (505) 476-3462  
E-mail: [CarlJ.Chavez@state.nm.us](mailto:CarlJ.Chavez@state.nm.us)  
Website: <http://www.emnrd.state.nm.us/ocd/>  
(Pollution Prevention Guidance is under "Publications")

NOTICE OF PUBLICATION

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

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**(GW-035) ConocoPhillips, Beverly Cox, 61 County Road 4900, P.O. Box 217, Bloomfield, New Mexico 87413 (Phone: (505) 863-1023), has submitted a discharge plan renewal application for the previously approved discharge plan for their San Juan Basin Gas Plant, located in the NW/4 NW/4 of Section 14, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. Approximately 790,950 gallons per month of waste water is 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. Ground water 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 in order to protect fresh water.**

The NMOCD has determined that the application is administratively complete. The NMOCD will accept comments and statements of interest regarding this application and will create a facility-specific mailing list for persons who wish to receive future notices. Persons interested in obtaining further information, submitting comments or requesting to be on a facility-specific mailing list for future notices may contact the Environmental Bureau Chief of the Oil Conservation Division at the address given above. The administrative completeness determination may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday, or may also be viewed at the NMOCD web site <http://www.emnrd.state.nm.us/ocd/>.

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 3<sup>rd</sup> day of November 2006.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

S E A L

Mark Fesmire, Director

Description	FUND	CES	DFA ORG	DFA ACCT	ED ORG	ED ACCT	AMOUNT	
1 CY Reimbursement Project Tax	064	01						1
5 Gross Receipt Tax	064	01		2329	900000	2329134		2
3 Air Quality Title V	092	13	1300	1696	900000	4169134		3
4 PRP Prepayments	248	14	1400	9696	900000	4969014		4
4 Climax Chemical Co.	248	14	1400	9696	900000	4969015		5
4 Circle K Reimbursements	248	14	1400	9696	900000	4969248		6
7 Hazardous Waste Permits	339	27	2700	1696	900000	4169027		7
8 Hazardous Waste Annual Generator Fees	339	27	2700	1696	900000	4169339		8
10 Water Quality - Oil Conservation Division	341	29		2329	900000	2329029	100.00	10
11 Water Quality - GW Discharge Permit	341	29	2900	1696	900000	4169029		11
12 Air Quality Permits	631	31	2500	1696	900000	4169031		12
13 Payments under Protest	651	33		2919	900000	2919033		13
14 Xerox Copies	652	34		2349	900000	2349001		*14
15 Ground Water Penalties	652	34		2349	900000	2349002		15
16 Witness Fees	652	34		2349	900000	2439003		16
17 Air Quality Penalties	652	34		2349	900000	2349004		17
18 OSHA Penalties	652	34		2349	900000	2349005		18
19 Prior Year Reimbursement	652	34		2349	900000	2349006		19
20 Surface Water Quality Certification	652	34		2349	900000	2349009		20
21 Jury Duty	652	34		2349	900000	2349012		21
22 CY Reimbursements ( i.e. telephone)	652	34		2349	900000	2349014		22
23 UST Owner's List	783	24	2500	9696	900000	4969201		*23
24 Hazardous Waste Notifiers List	783	24	2500	9696	900000	4969202		*24
25 UST Maps	783	24	2500	9696	900000	4969203		*25
26 UST Owner's Update	783	24	2500	9696	900000	4969205		*26
28 Hazardous Waste Regulations	783	24	2500	9696	900000	4969207		*28
29 Radiologic Tech. Regulations	783	24	2500	9696	900000	4969208		*29
30 Superfund CERLIS List	783	24	2500	9696	900000	4969211		*30
31 Solid Waste Permit Fees	783	24	2500	9696	900000	4969213		31
32 Smoking School	783	24	2500	9696	900000	4969214		32
33 SWQB - NPS Publications	783	24	2500	9696	900000	4969222		*33
34 Radiation Licensing Regulation	783	24	2500	9696	900000	4969228		*34
35 Sale of Equipment	783	24	2500	9696	900000	4969301		*35
36 Sale of Automobile	783	24	2500	9696	900000	4969302		*36
37 Lust Recoveries	783	24	2500	9696	900000	4969814		**37
38 Lust Repayments	783	24	2500	9696	900000	4969815		**38
39 Surface Water Publication	783	24	2500	9696	900000	4969801		39
40 Exxon Reese Drive Ruidoso - CAF	783	24	2500	9696	900000	4969242		40
41 Emerg. Hazardous Waste Penalties NOV	957	32	9600	1696	900000	4164032		41
42 Radiologic Tech. Certification	987	05	0500	1696	900000	4169005		42
44 Ust Permit Fees	989	20	3100	1696	900000	4169020		44
45 UST Tank Installers Fees	989	20	3100	1696	900000	4169021		45
46 Food Permit Fees	991	26	2600	1696	900000	4169026		46
43 Other								43

Gross Receipt Tax Required \_\_\_\_\_ Site Name & Project Code Required \_\_\_\_\_ TOTAL \_\_\_\_\_

Contact Person: Wayne Price Phone: 476-3490 Date: 11/1/06

Received in ASD By: \_\_\_\_\_ Date: \_\_\_\_\_ RT #: \_\_\_\_\_ ST #: \_\_\_\_\_



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

Todd Kinard  
Compliance Coordinator  
505-632-4954  
email [Todd.A.Kinard@conocophillips.com](mailto:Todd.A.Kinard@conocophillips.com)

October 27, 2006

Certified Mail # 7006 0100 0003 2148 0477

Mr. Carl Chavez  
Environmental Bureau  
Energy, Minerals & Natural Resources Department  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

2006 OCT 30 PM 12 30

**Re: The original Filing Fee Payment check issued on October 25, 2006  
in conjunction with the attached letter was not signed.**

Dear Mr. Chavez,

ConocoPhillips is submitting the renewal filing fee of \$100 for the San Juan Basin Gas Plant Ground Water Discharge Plan (GW-035). Please replace the check issued on October 25, 2006 with this check issued on October 27, 2006. The previous check was not signed and has been voided.

Should you have questions or need assistance please contact Beverly Cox at 505-863-1023 or Todd Kinard at 505-632-4954.

Sincerely,

Todd Kinard

**ConocoPhillips** 2006 OCT 26 PM 1 08

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

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

October 25, 2006

Certified Mail # 70041350000293195371

Mr. Carl Chavez  
Environmental Bureau  
Energy, Minerals & Natural Resources Department  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

**Re: Discharge Plan GW-035 Renewal Filing Fee  
ConocoPhillips San Juan Basin Gas Plant  
San Juan County, New Mexico**

Dear Mr. Chavez,

ConocoPhillips is submitting the renewal filing fee of \$100 for the San Juan Basin Gas Plant Ground Water Discharge Plan (GW-035), located in San Juan County, New Mexico. The required permit fee of \$4000 for Gas Processing Plants will be paid at the time of permit approval.

Should you have questions or need assistance please contact Beverly Cox at 505-863-1023 or Todd Kinard at 505-632-4954.

Sincerely,



Todd Kinard

Enclosures

GWDP-035 Filing Fee – San Juan Basin Gas Plant

cc: Brandon Powell  
State of New Mexico, Minerals and Natural Resources  
Oil Conservation, District Office III  
1000 Rio Brazos Road  
Aztec, NM 87410

Beverly Cox  
ConocoPhillips  
P. O. Box 119  
Rehoboth, NM 87322



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

June 22, 2006

Mr. Wayne Price  
Bureau Chief, 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**

**Certified Mail # 7004 1350 0002 9319 5302**

Dear Mr. Price:

The Discharge Plan for the San Juan Basin Gas Plant was last renewed on October 26th, 2001. The current plan approval expires on October 27, 2006.

In accordance with Section 3-109 of the New Mexico Water Quality Control Commission Regulations and the current approval, the San Juan Basin Gas Plant hereby requests the Discharge Plan approval be renewed. Enclosed are two copies of the San Juan Basin Gas Plant's Discharge Plan for your review.

If you have any questions or require additional information, please contact F. P. Micky Colomb at (505) 632-4905. Thank you for your assistance.

Sincerely,

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

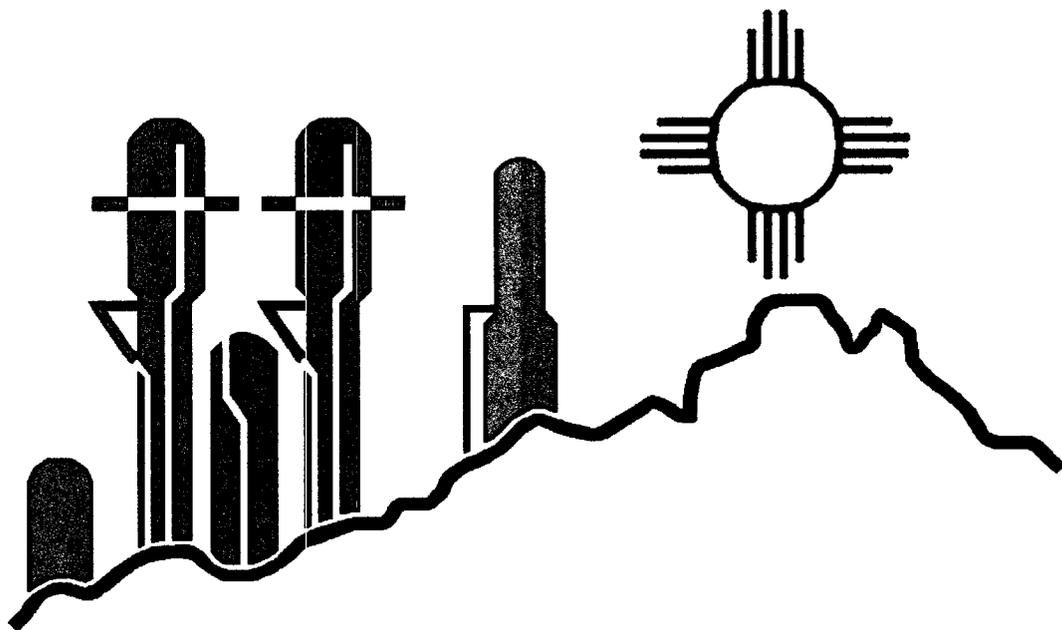
Attachments

- 2 Copies - Addressee
- 1 Copy - OCD District III  
1000 Rio Brazo Road  
Aztec, NM 87410

bcc: w/attachment  
Lane Ayers, San Juan Basin Gas Plant  
Beverly Cox, Wingate Fractionator  
HSE file # 2859

# ***San Juan Basin Gas Plant***

***Operated by Conoco Inc.***



**CONOCO, INC.**  
**NATURAL GAS AND GAS PRODUCTS DEPARTMENT**  
**SAN JUAN GAS PLANT**

**LOCATION:** 1 Mile North of Bloomfield, New Mexico  
**OWNERSHIP:** 50% Conoco, Inc. - Operator  
 50% BP Amoco  
**PLANT START-UP:** November, 1986  
**PLANT STAFF:** 22 Employees

	<u>PLANT DESIGN</u>	<u>CURRENT OPERATION (8/01/01)</u>
Process Type:	Cryogenic	
Plant Capacity:	500,000 Mcfd	510,000 Mcfd
Plant Recoveries:		
Ethane (C <sub>2</sub> ):	97.5%	98.0%
Propane (C <sub>3</sub> ):	100.0%	100.0%
Iso-Butane (IC <sub>4</sub> ):	100.0%	100.0%
Normal-Butane (NC <sub>4</sub> ):	100.0%	100.0%
Hexane+ (C <sub>5</sub> +):	100.0%	100.0%
Inlet Gas:	3.6 GPM / MCF	3.750 GPM / MCF
Inlet Pressure:	900 psig	900 psig
Residue Pressure:	850 psig	850 psig
Product Capacity:	42,000 BPD	45,000 BPD

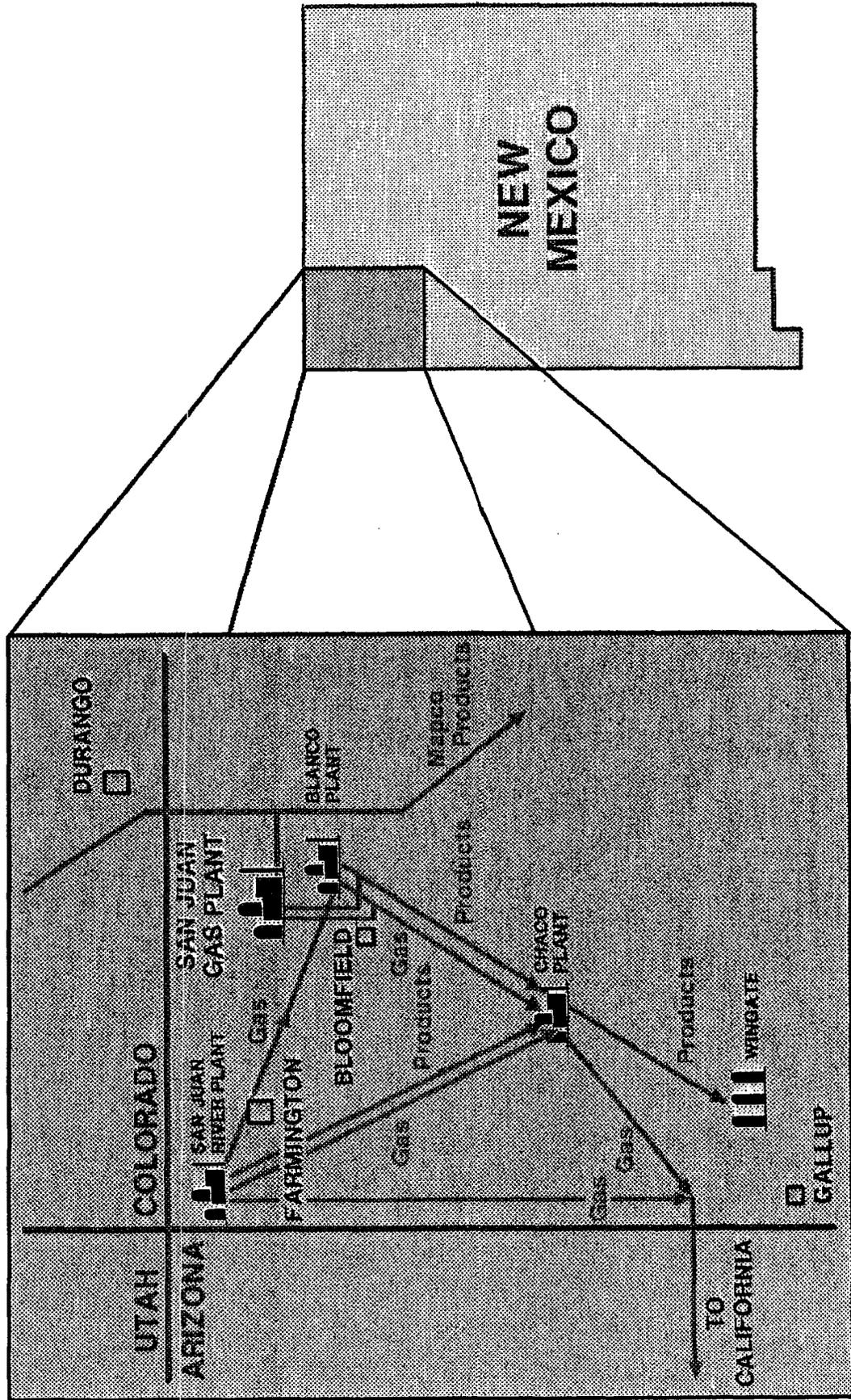
**PLANT COMPRESSION:**

	<u>Inlet</u>	<u>Residue</u>	<u>Refrig.</u>	<u>Other</u>
No. of Units:	1	2	3	2
Types:	Dresser	Dresser	York	White
Available HP:	15,000	30,000	4,500	1,200

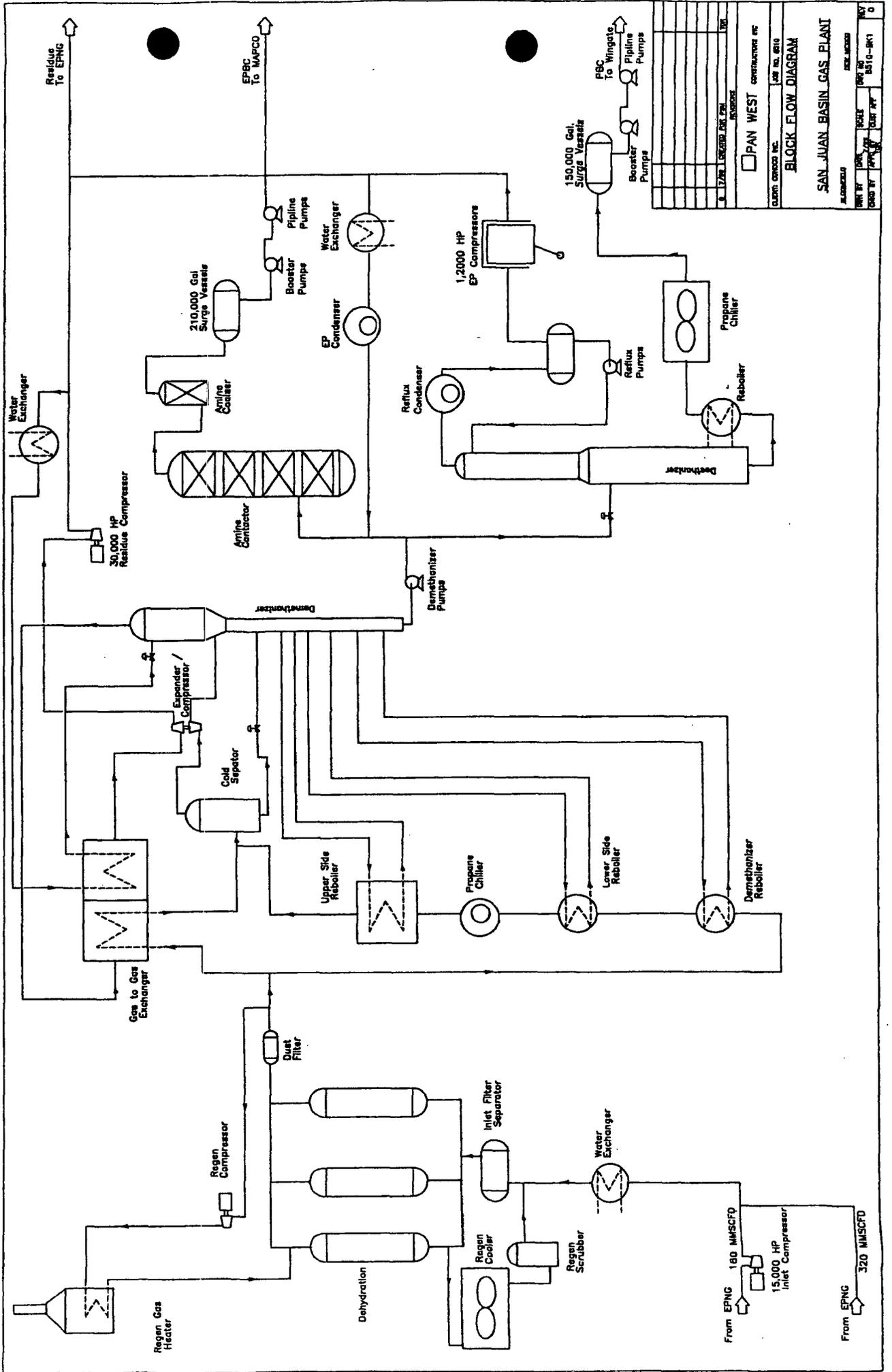
**PLANT PRODUCT DISPOSITION:**

The EPBC Liquid Product (about 33,000 BPD) is transported by MAPCO (Williams) to the Gulf Coast.  
 The PBC Liquid Product (about 12,000 BPD) is transported to Conoco's Wingate Fractionation Facility.

# NATURAL GAS & GAS PRODUCTS SAN JUAN PLANT







PAN WEST		CONTRACTOR INC.	
CLIENT:	CONOCO INC.	JOB NO.:	0810
DATE:	12/28/78	SCALE:	AS SHOWN
BY:	J. L. GARDNER	DESIGNED BY:	J. L. GARDNER
CHECKED BY:	W. J. GARDNER	DATE:	12/28/78

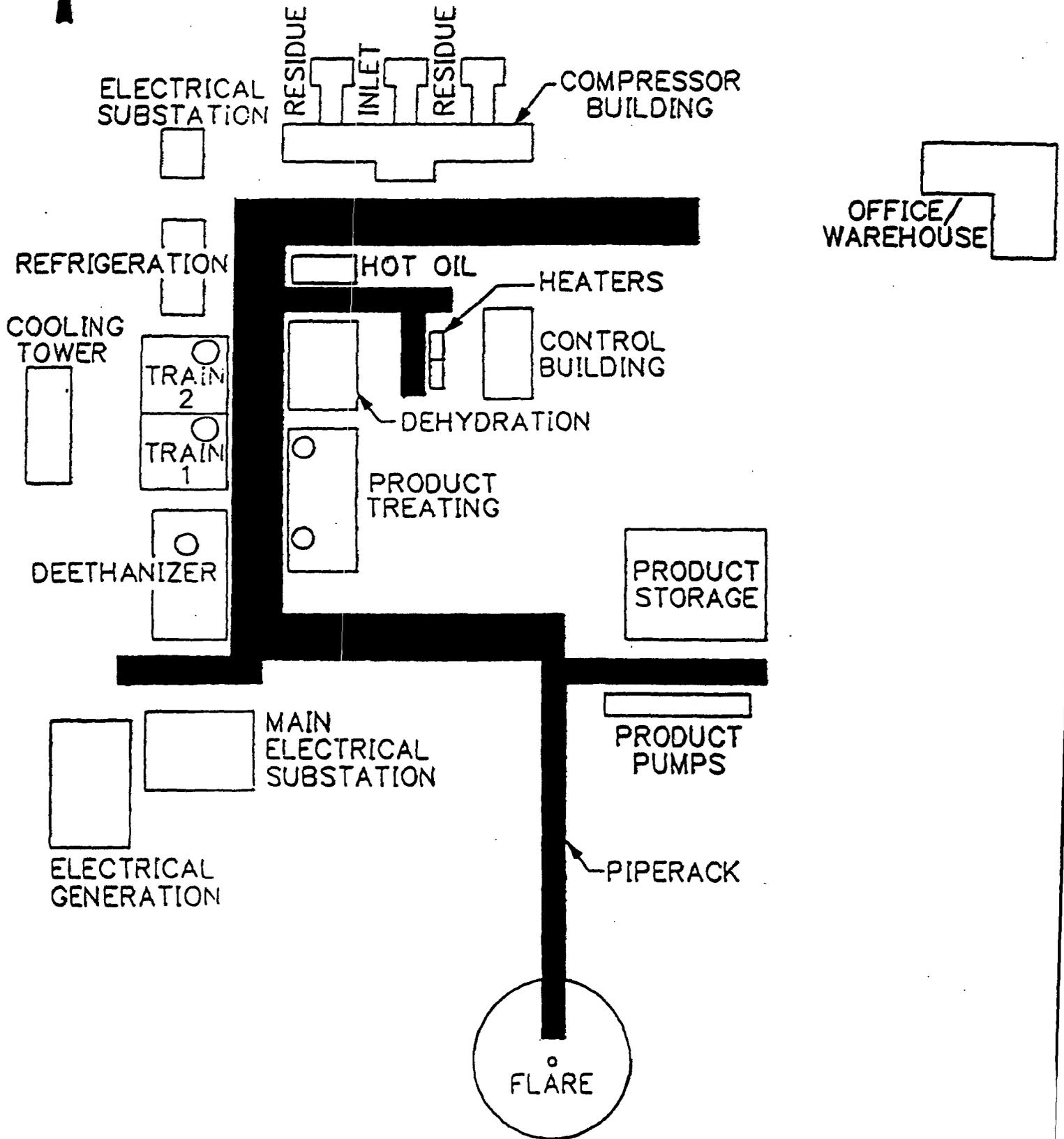
**BLOCK FLOW DIAGRAM**

**SAN JUAN BASIN GAS PLANT**

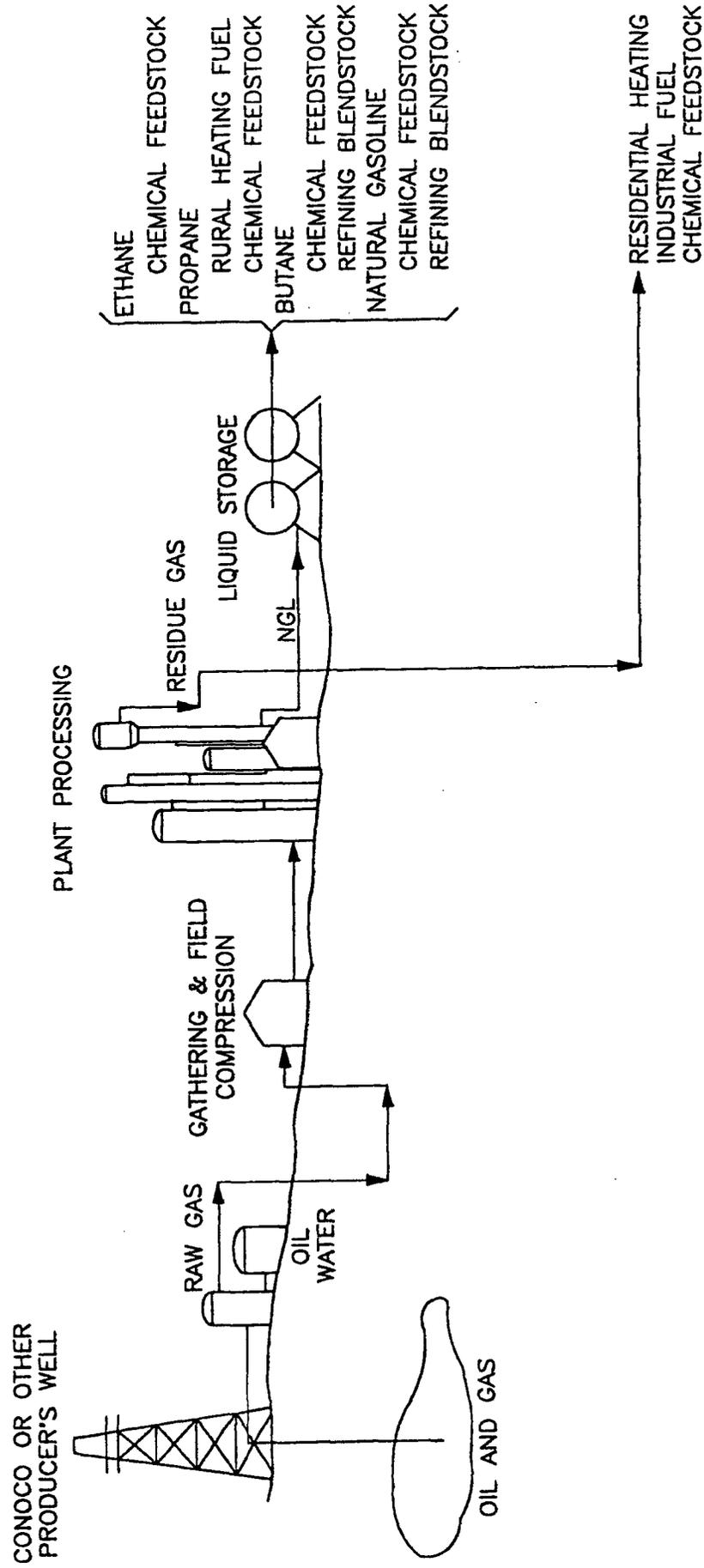
PROJECT NO.:	0810
DATE:	12/28/78
SCALE:	AS SHOWN
BY:	J. L. GARDNER
CHECKED BY:	W. J. GARDNER
DATE:	12/28/78
PROJECT:	SAN JUAN BASIN GAS PLANT
CLIENT:	CONOCO INC.
CONTRACTOR:	PAN WEST CONTRACTOR INC.

# SAN JUAN GAS PLANT

## MAJOR EQUIPMENT LAYOUT



# NATURAL GAS GATHERING SYSTEM



# **DISCHARGE PLAN**

**SAN JUAN BASIN GAS PLANT**

**BLOOMFIELD, NEW MEXICO  
SAN JUAN COUNTY**

**June 2006**

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: (505) 863-1023
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: Operations Manager

Signature: *Lane Ayers*

Date: 6/22/06

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

**DISCHARGE PLAN  
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- A. Wastewater Collection System Schematic Diagram
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- 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/MAPCO 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 CO<sub>2</sub> from the EPBC product stream. Although inlet and residue gas H<sub>2</sub>S concentrations meet pipeline quality standards, trace amounts of H<sub>2</sub>S remain in the EPBC stream and are subsequently removed with the CO<sub>2</sub> 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 H<sub>2</sub>S.

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 - Compliance Coordinator  
ConocoPhillips - Wingate Fractionator  
P. O. Box 119  
Rehoboth, NM 87322  
(505) 863-1023
- b. Site Contact:  
Micky Colomb - Process Foreman  
ConocoPhillips - San Juan Basin Gas Plant  
P.O. Box 217  
Bloomfield, NM 87413  
(505)632-4905

## **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**

El Paso Natural Gas Company and Enterprise Products jointly own the property that the San Juan Basin Gas Plant is located on.

El Paso Natural Gas Company  
81 County Road 4900  
Bloomfield, NM, 87413  
Russ Pyeatt (505) 632-6001

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	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 HSW700/710 and water mix estimated quantity per month is 3500 bbls mix	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.

## 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 earthen dikes, 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 H<sub>2</sub>S scavenging chemical is used in TK-804 to scavenge the H<sub>2</sub>S 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 and the OCD's exception for netting these ponds.
- (2) There are no on-site leach fields.
- (3) There are no on-site injection wells.  
There is one additional catch water basin/dry out pit for drying out the evaporation pond and cooling tower basin sediment. When this maintenance occurs, the pit is temporarily lined.
- (5) There is no on-site solids disposal.
- (6) There is no landform 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 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

**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 Catch Water Basin was constructed inside the fence at the south edge of the property. The catch water 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 Library HSE file # 2859
- One copy to Lane Ayers

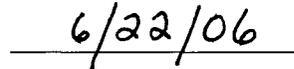
**XV. Certification**

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

Lane Ayers



Operations Manager  
San Juan Basin Gas Plant  
L48 San Juan Business Unit



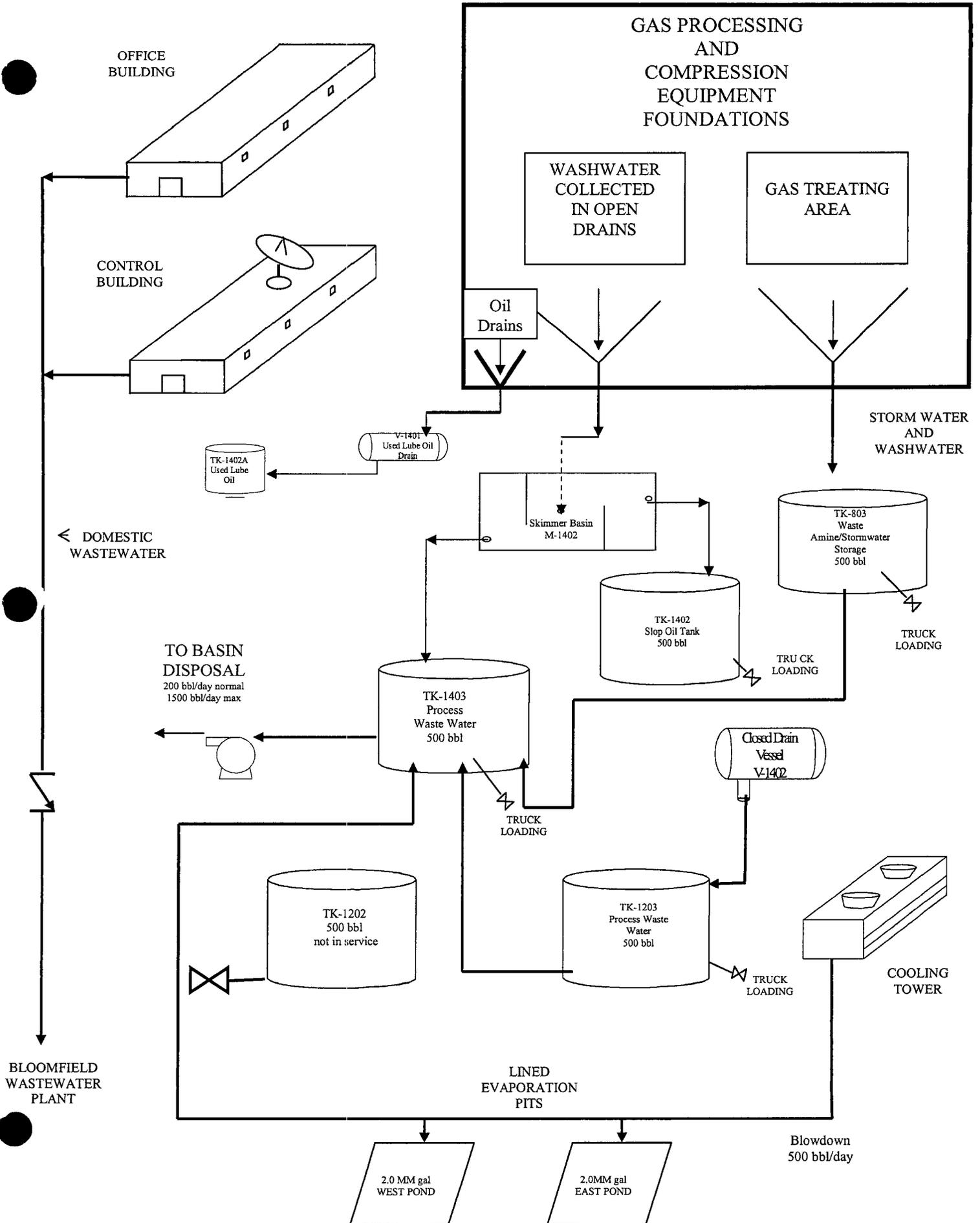
**ConocoPhillips**



**Appendix A**

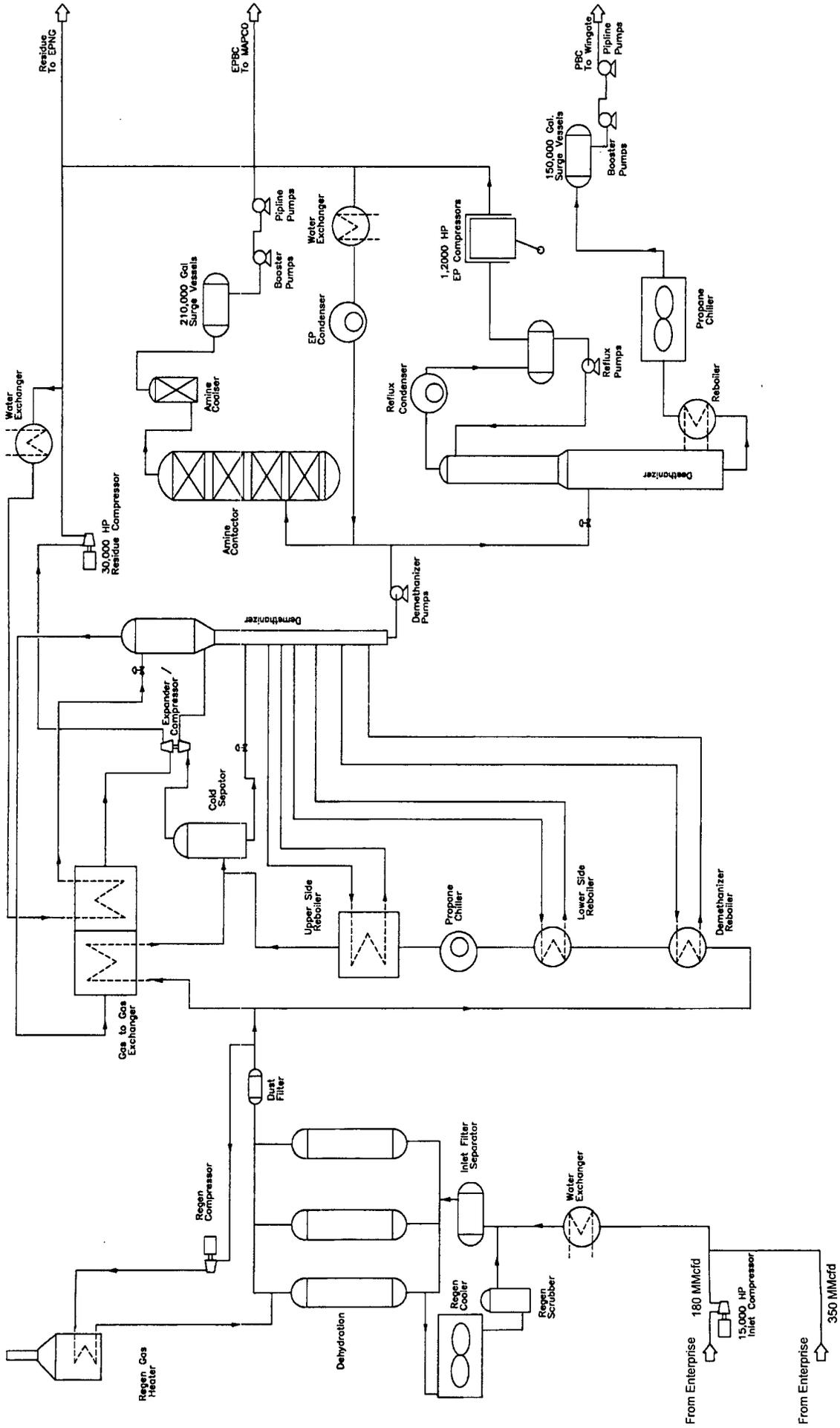
**Wastewater Collection System  
Schematic Diagram**

SCHMATIC DIAGRAM WASTEWATER DRAINAGE SYSTEM  
SAN JUAN BASIN GAS PLANT



**Appendix B**  
**Process Flow Diagram**

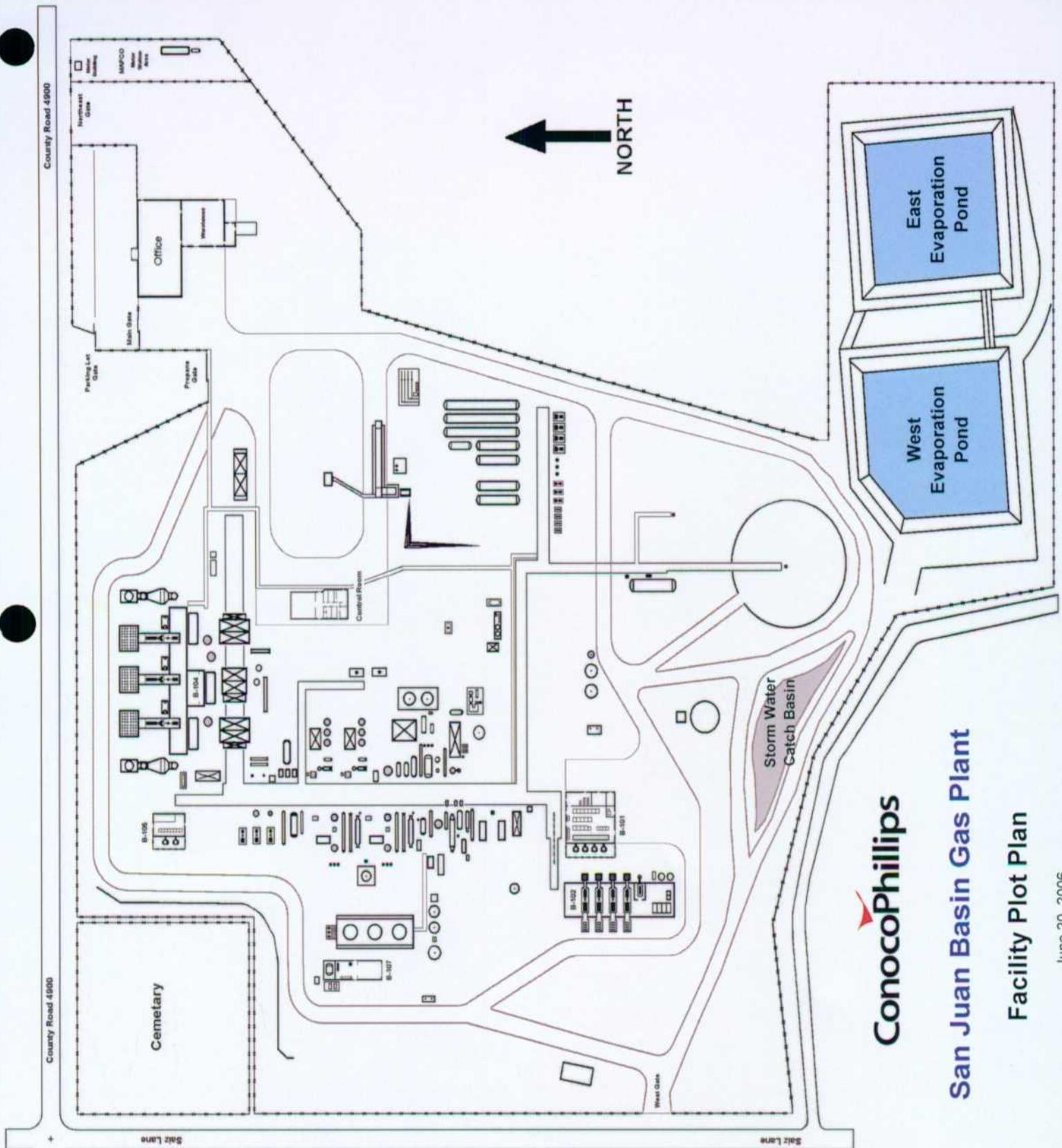
# San Juan Basin Gas Plant - Process Flow Diagram



**Appendix C**

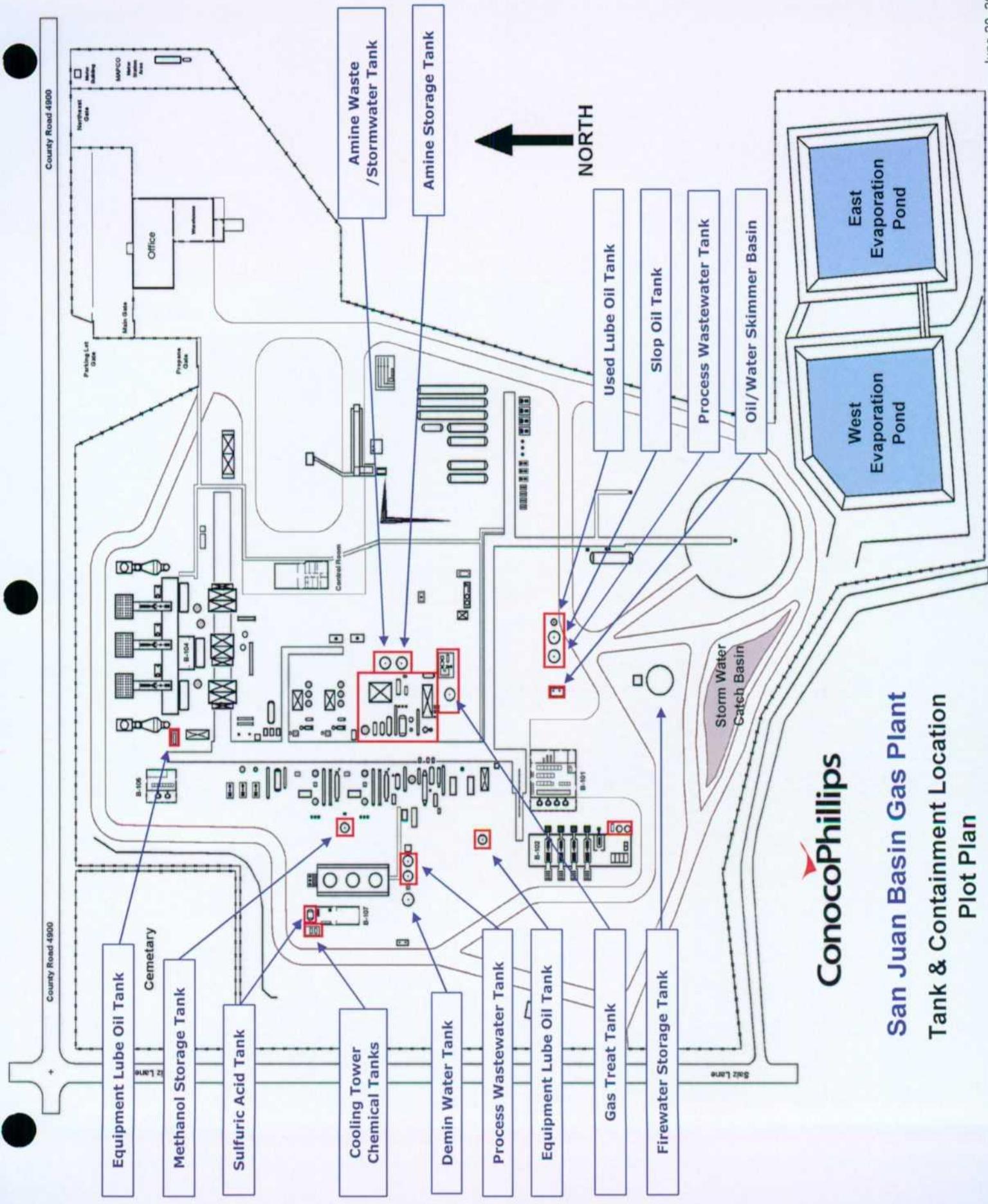
**Facility Plot Plan**

**Tank & Containment Location Plot Plan**



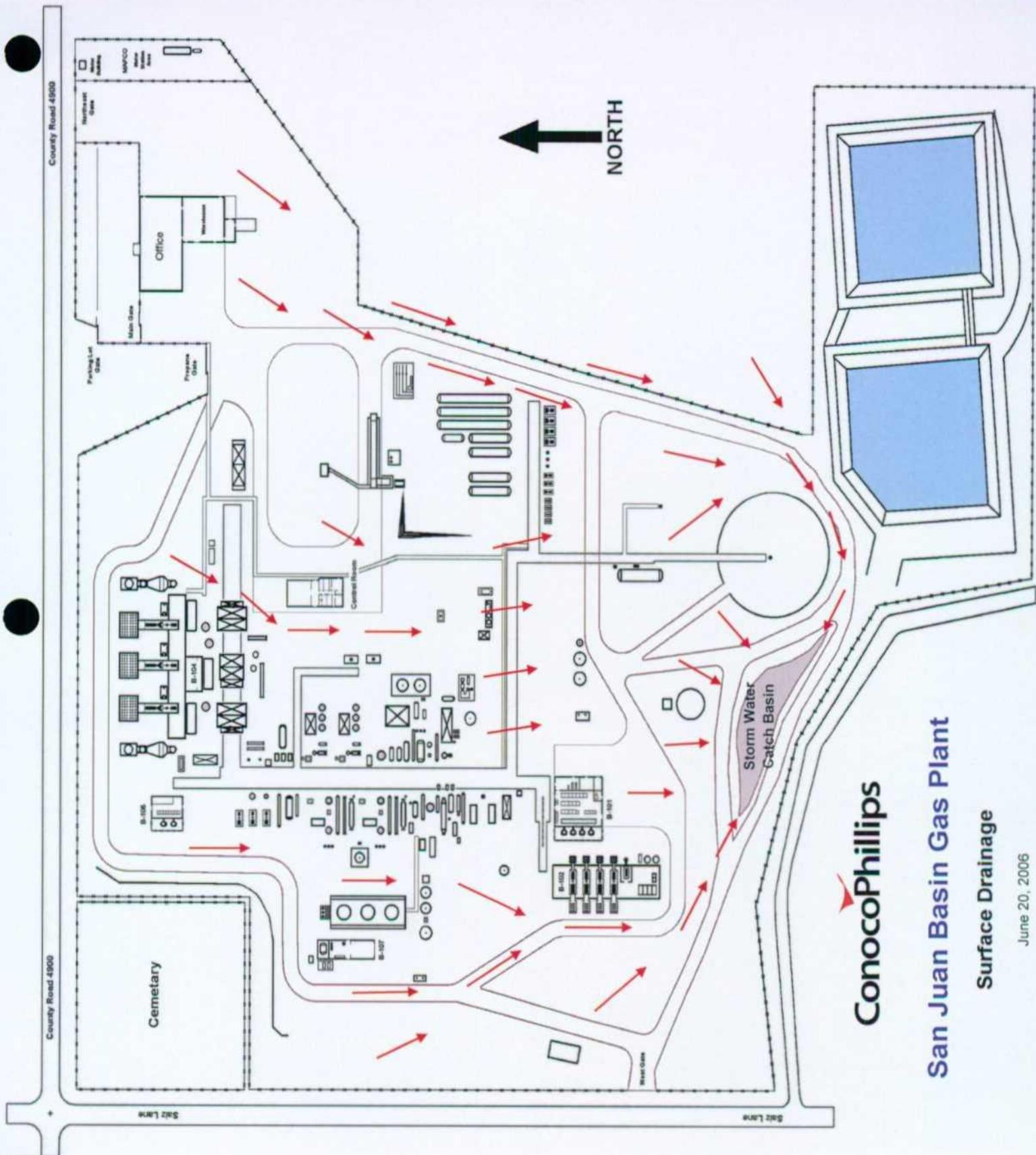
**ConocoPhillips**  
**San Juan Basin Gas Plant**  
**Facility Plot Plan**

June 20, 2006



**ConocoPhillips**  
**San Juan Basin Gas Plant**  
**Tank & Containment Location**  
**Plot Plan**

**Appendix D**  
**Facility Surface Drainage Plot Plan**



**ConocoPhillips**  
**San Juan Basin Gas Plant**  
**Surface Drainage**

June 20, 2006

**Appendix E**

**San Juan Basin Gas Plant Chemicals Stored and Used Inventory**

SAN JUAN PLANT  
CHEMICAL STORAGE INVENTORY

Chemical	Spec. Grav.	Manufacturer	Hazards	Quantity (Lbs)		Quantity (Gal, Bbl,...)		Days On Site	Stge. Code	Press. Code	Temp. Code	Location
				Maximum	Average	Maximum	Average					
Butane/Gasoline Mix			A,C,F	97,000	90,000			365	A	2	4,5,6,7	Process
Carbon Dioxide	1.65	General Electric	A	50,000	40,000			365	A	2	5,6,7	Process & Amine Area
Chlorine		PPG	(1)EH/A,P, R	1,500	900			365	L	2	4	Cooling Tower
Condensate (Natural Gasoline)			A,C,F	245,108	100,000			365	A	2	4,5,6,7	Process & Storage Area
Diesel, No. 2	0.93		A,C,F	33,900	18,300			365	A,C,R	1	4	Solar & Firewater Pump Bldgs Between TK-801 and TK-802
Diethanolamine 85%	1.08	VoPak USA	A,C	200,000	100,000			365	A	1	4	TK-801
Ethane			A,F,P	134,650	110,000			365	A	2	4,5,6,7	Process & Surge Area
Hydrogen Sulfide			(2)EH/A,C, F,P	2,000	1,500			365	R	2	5,6,7	Amine Area
Methane (Sweet Natural Gas)			A,F,P	1,100,000	1,000,000			365	A	2	4,5,6,7	Process & Compression
Methanol	0.79	DuPont	A,C,F	70,000	23,000			365	A	1,2	4	TK-1401
PBC Mix/EPBC Mix			A,C,F	1,431,800	505,165			365	A	2	4,5,6,7	Product Surge Tanks
Propane			A,F,P	208,304	185,670			365	A	2	4,5,6,7	Refrigerant Area
Slop Oil	0.71		A,C,F	125,000	62,500			365	A	1	4	TK-1402
Sulfuric Acid		Koch	(3)EH/A,C, R	22,000	10,000			365	A,M	1	4	V-1201 & Cooling Twr
Activated Alumina		Alcoa										
Angry Orange Biodegradable Degreaser	1.06	American Sales and Service	BT/A			110 gal	< 110 gal	365	D	1	4	B-107
Asto 500	1.00	Royal Lubricants Co.	NH			165 gal	55 gal	365	D	1	4	B-107
A. T. Fluid Type F			NH	800	600			365	D,R	1	4	B-107
B&B 3100	0.95	B&B Chemical Co.	BT/A	300	200			365	F	1	4	Shop
Barrier Fluid FDA		Royal Purple	BT			75 gal	< 55 gal	365	D	1	4	B-107

**SAN JUAN PLANT  
CHEMICAL STORAGE INVENTORY**

Chemical	Spec. Grav.	Manufacturer	Hazards	Quantity (Lbs)		Quantity (Gal, Bbl, ...)		Days On Site	Stge. Code	Press. Code	Temp. Code	Location
				Maximum	Average	Maximum	Average					
Benzene		DuPont		Not Stored								
Butane/isobutane			A,F,P	PBC/EPBC mix				365				
Capella Oil WF68 (01562)	0.91	Texaco	NH	2,700	2,000			365	A,N	1,2	4,5	B-107
Cecarbon Activated Carbon	2.10	Atochem	BT/A	2,000	1,100			365	A,I,K	1,2	4,5	Oil Storage
Cer-Wool Blanket Types: HT, HP, RT, LT		C-E Refractories										
Cer-Wool Moldable F		C-E Refractories										
Cerblanket		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	A,D	1	4,5	B-107
Denstone 57 (D-57)		Norton		Not Stored								
Dexron III and Mercon			NH	800	500			365	A,D	1,2	4	B-107
Dianodic DN2761		Betzdearborn		5,700	3,200	450 gal	250 gal	365	A	1	5	Cooling Tower
Dianodic DN2318		Betzdearborn		4,400	2,400	450 gal	250 gal	365	A	1	5	Cooling Tower
F-10 Biodegradable Soap		American Sales and Service	BT/A			75 gal	< 55 gal	365	A,D	1	4	B-107
Foamglas Insulation		Pittsburgh Corning										
Foam-trol AF 1440	0.84	Betzdearborn	BT	386		55 gal		365	A	1	4	Cooling Tower
Gear Oils 68, 100, 150, .....			NH	2,500	2,000			365	D	1,2	4	B-107
HD Fleet Engine Oil/HD Fleet Supreme			NH	1,600	800			365	D	1	4,5	B-107
HSW700/710		Baker Petrolite	BT			300 gal	55 gal	365				TK-804
Hydroclear Heat Transfer Oil			NH	180,000	175,000			365	A	2	5	V-1101
Hydroclear Super All-Season Motor Oil			NH			55 gal	25 gal	365	M	1	4	B-107
Hydroclear Turbine Oil			NH	100,900	57,000			365	A	1	4,5	B-107

**SAN JUAN PLANT  
CHEMICAL STORAGE INVENTORY**

Chemical	Spec. Grav.	Manufacturer	Hazards	Quantity (Lbs)		Quantity (Gal, Bbl, ...)		Days On Site	Stge. Code	Press. Code	Temp. Code	Location
				Maximum	Average	Maximum	Average					
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	J	1	4	Cooling Tower
RPA - 804		Champion Tech.	BT/A, C, F			75	<55	gal	A, D, F	1	4	By TK-804
Safety-Kleen Premium Gold Solvent		Safety-Kleen Corp.	BT	250	0	30	<30	gal	D	1	4	Shop
Sahara DG Herbicide		American Cyanamid		Not Stored								
Soda Ash		Rhone-Poulenc Basic Chemicals Co.	BT/A	2,500	1,250				J	1	4	Cooling Tower
Spectrus BD1500		Betzdearborn		470	470	55	55	gal	D	1	4	Cooling Tower
Spectrus NX1100		Betzdearborn		Not Stored								
Spectrus OX1201		Betzdearborn	BT			200	<55	gal	E	1	4	B-107
Super Hydraulic Oil 22, 32, ...			NH	4,800	3,000				A, D	1, 2	4, 5	B-107
Super-Sta Grease			NH	20	10				K	1	4	Oil Storage
Surflo S1259	1.45	Exxon Chemical	BT/A, C			55	< 55	gal	E	1	4	B-107
Syncon Synthetic R&O Oil			NH			4,000	2,500	gal	A	1	4	Solars & TK-1300
Tretolite CGW0437D	1.45	Petrolite	BT/A, C			165	<55	gal	A	1	4	Inlet Area
Unleaded Gasoline	0.77		BT	500	250				F	1	4	Outside Warehouse

**Hazards:** NH = Not Hazardous      F = Fire  
 BT = Below Threshold            P = Pressure  
 EH = Extremely Hazardous Substance      R = Reactive  
 A = Acute  
 C = Chronic

(1) Chlorine (100 = Threshold Quantity)  
 (2) Hydrogen Sulfide (500 = Threshold Quantity)  
 (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>Rule 712 Reference</u>	<u>Process Generating Waste</u>	<u>Number of Units</u>	<u>Quantity per unit</u>	<u>Totals</u>	<u>Frequency of change "Months"</u>	<u>Annualized Waste Generated</u>	<u>Disposal</u>
Amine Sock Filters	D.2.c	Amine System	1	200	200	3	800	- Drain, dried, keep separate, & disposed at local landfill
Amine Charcoal Filters	D.2.c	Amine System	1	45	45	3	180	- Drain, dried, keep separate, & disposed at local landfill
D-R Lub Skid Filters	D.2.0	D-R Compressor Units	3	51	153	24	76.5	- Drain, dried, keep separate, & disposed at local landfill
Solar Lub Skid Filters	D.2.0	Solar Generator Units	4	5	20	12	20	- Drain, dried, keep separate, & disposed at local landfill
Refrigeration Compressor Lub Filters	D.2.0	Refrig. Compressor Units	3	1	3	12	3	- Drain, dried, keep separate, & disposed at local landfill
EP Compressor Lub Filters	D.2.0	EP Compressor Units	2	1	2	12	2	- Drain, dried, keep separate, & disposed at local landfill
Instrument Air Compressor Filters	D.2.0	Instrument Air Units	3	9	27	12	27	- Disposed of at local landfill
Instrument Air Dehy System	D.2.f	Instrument Air Dehy System	1	10	10	6	20	- Disposed of at local landfill
Expander Lub Skid Filters	D.2.0	Expander Lub Skid	2	3	6	12	6	- Drain, dried, keep separate, & disposed at local landfill
Emergency Generator Filters	D.2.0	Emergency Generator	1	10	10	12	10	- Drain, dried, keep separate, & disposed at local landfill
Fire Water Pump Filters	D.2.0	Fire Water Pump	1	3	3	12	3	- Drain, dried, keep separate, & disposed at local landfill
Regen Compressor Lub Filters	D.2.0	Regen Compressors	2	1	2	24	1	- Drain, dried, keep separate, & disposed at local landfill
P-303 Pump Lub Filters	D.2.0	EPBC Pumps	4	1	4	6	6	- Drain, dried, keep separate, & disposed at local landfill
Inlet Gas Filters	D.2.g	Inlet Gas Dehy Units	2	28	56	6	112	- Drain, dried, keep separate, & disposed at local landfill
Inlet Gas Coalescing Filters	D.2.g	Inlet Gas Dehy Units	2	27	54	12	54	- Drain, dried, keep separate, & disposed at local landfill
Inlet Gas Dust Filters	D.2.f	Inlet Gas Dehy Units	2	55	110	6	220	- Drain, dried, keep separate, & disposed at local landfill
EPBC Coalescing Filters	D.2.g	EPBC Dryer Unit	1	25	25	3	100	- Drain, dried, keep separate, & disposed at local landfill
Avon Inlet Air Filters	D.1.k	D-R Compressor Units	3	224	672	24	336	- Disposed of at local landfill
Solar Inlet Air Filters	D.1.k	Solar Generator Units	4	48	192	24	96	- Disposed of at local landfill
<b>Total Annual Filters Waste: 2,075</b>								
Molecular Sieve U194	D.2.k	Inlet Gas Dehy Units	6	586	3516	ft3	1,172	ft3 - Disposed of at local landfill
Support Balls	D.3.j	Inlet Gas Dehy Units	6	33	198	ft3	99	ft3 - Disposed of at local landfill
Activated Alumina	D.2.a	EPBC Dryer Units	2	195	390	ft3	130	ft3 - Disposed of at local landfill
Activated Alumina	D.2.a	Instrument Air Dryer Unit	1	16	16	ft3	16	ft3 - Disposed of at local landfill
Activated Carbon	D.2.b	Instrument Air Dryer Unit	1	4	4	ft3	4	ft3 - Disposed of at local landfill
Oil Adsorbing Material	D.1.n	Clean-up around Plant	-	675	675	ft3	2,025	ft3 - Drain, dried, keep separate, & disposed at local landfill
Evaporation / Cooling Tower sediment	D.3.n	Cooling Tower	3	25	75	yd3	60	yd3 - Drain, dried, keep separate, & disposed at local landfill
Pipe scale	D.2.j	Piping and Equipment	-	-	-	-	-	- Disposed of at local landfill
Oil Rags	D.1.n	Plant maintenance activities	-	-	-	-	-	- Drain, dried, keep separate, & disposed at local landfill
Insulation Material	D.3.f	Plant maintenance activities	-	-	-	-	-	- Disposed of at local landfill
Aerosol Cans	N/A	Plant maintenance activities	-	-	-	-	-	- Safety Klean pick up
Paper Trash	D.1.k	Office Trash	-	-	-	-	-	- Disposed of at local landfill
Sand Blasting Media - B/B Abrasive	D.2.n	Sand blasting	-	-	-	-	-	- Disposed of at local landfill
Florescent lamps	N/A	Office lighting, Plant lighting	-	-	-	-	-	- Safety Klean pick up
<b>Total Annual Filters Waste: 2,075</b>								
<u>Liquid Waste</u>		<u>Process Generating This Waste</u>	<u>Storage Unit</u>	<u>Quantity per Day</u>	<u>Quantity per Month Gallons</u>		<u>Annualized Waste Generated</u>	
Produced Waste Waters		Inlet Scrubber Dumps	TK-1403	7,900	240,950	gal	2,891,400	gal - Pumped/hailed to Disposal Well
CT Blowdown water		Cooling Tower	Ponds	18,000	550,000	gal	6,600,000	gal - SJ Evaporation ponds or Disposal Well
Waste Amine		Waste Amine System	TK-803	3,600	10,920	gal	131,040	gal - Pumped/hailed to Disposal Well
Slop Oil (process liquids)		Inlet Scrubber Dumps	TK-1402	25	760	gal	9,120	gal - Sale to Giant Refinery
Solvents		Parts cleaning Unit	-	-	40	gal	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	gal	3000	gal - Recycled
Lab Waste		Laboratory	Satellite Accumulation	-	5 lbs.	lb.	60	lbs. - As needed upon OCD approval
Spent H2S scavenging solution HSW-700/710		Amine System	TK-804	-	-	gal	25,200	gal - As needed to Disposal Well

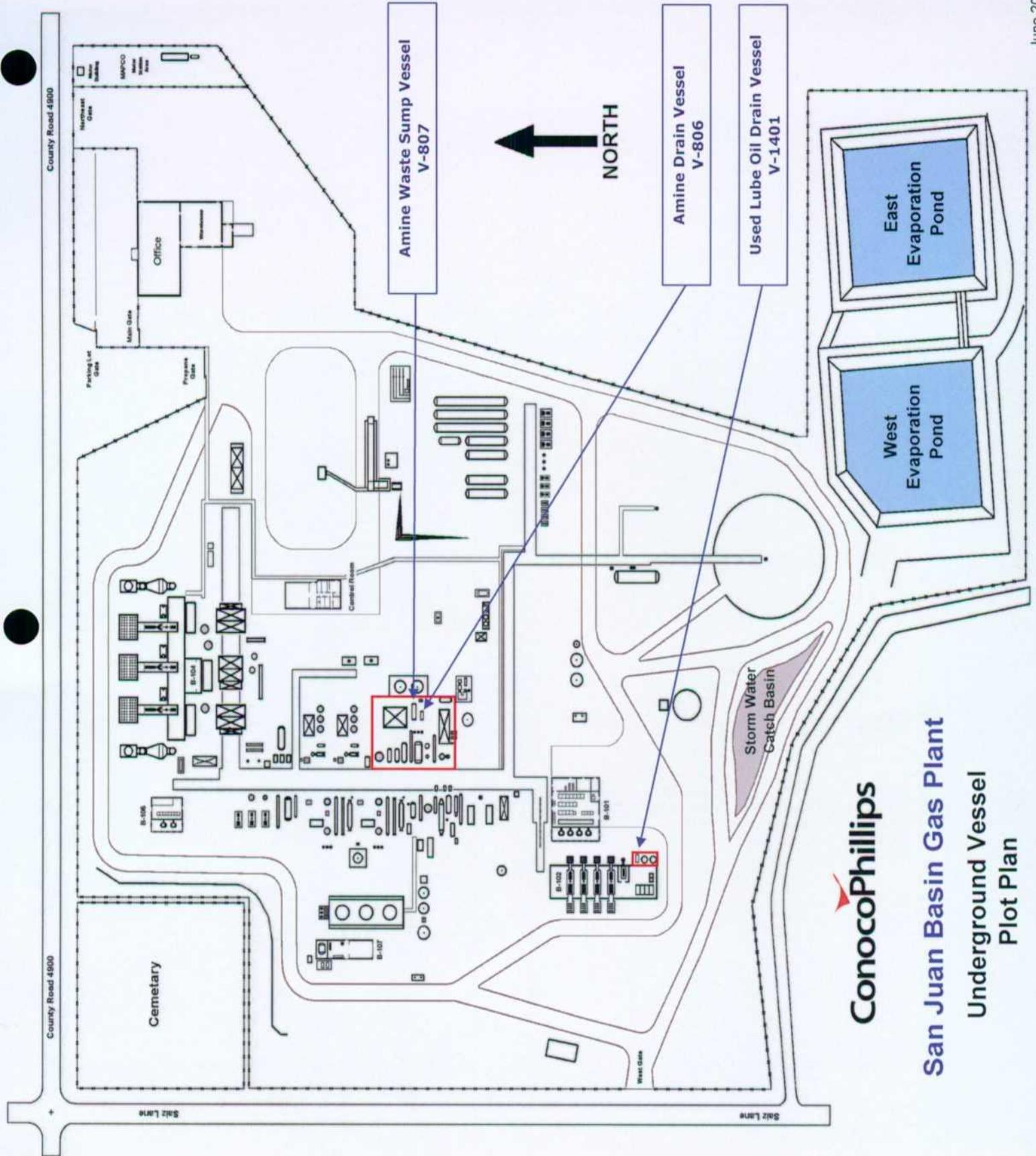
**Appendix G**  
**Underground Vessels**

## 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 <sup>(1)</sup>	Storm water <sup>(2)</sup>	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 <sup>(3)</sup>	0.25"	0.25"	0.25"
External Protection	Epoxy Coating	Epoxy Coating	Epoxy Coating
Design Pressure <sup>(4)</sup>	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	30			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.

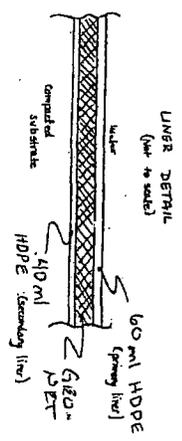
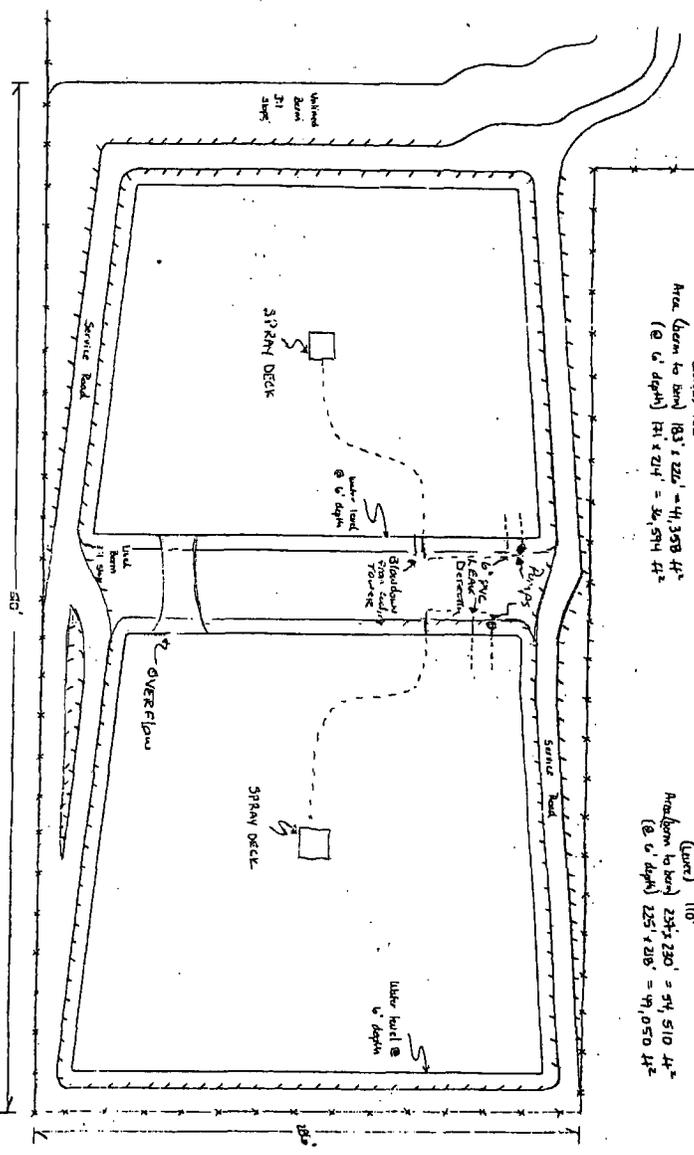
Concrete Evaporation Ponds  
Plan View - Scale: 1" = 40'

WEST POND

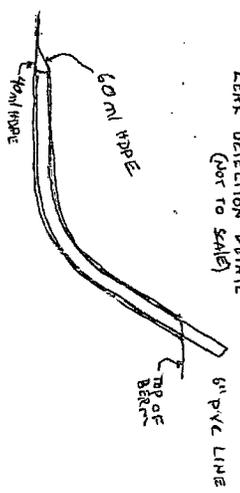
Elevation (Base) 94'  
Elevation (Liner) 102'  
Area (geom to pond) 183' x 226' = 41,358 sq ft  
(@ 6' depth) 41,358 / 6 = 6,893 cu ft

EAST POND

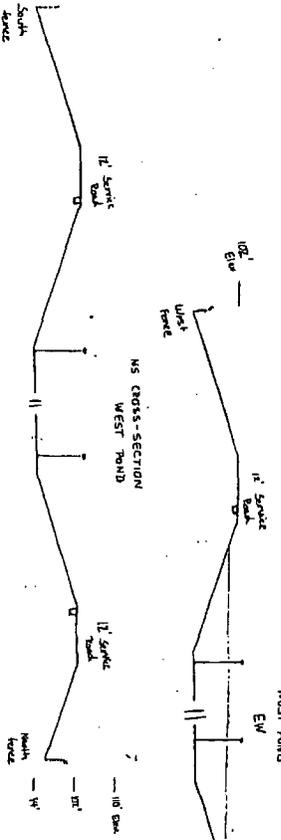
Elevation (Base) 102'  
Elevation (Liner) 110'  
Area (geom to pond) 225' x 230' = 51,750 sq ft  
(@ 6' depth) 51,750 / 6 = 8,625 cu ft



LEAK DETECTION DETAIL  
(NOT TO SCALE)



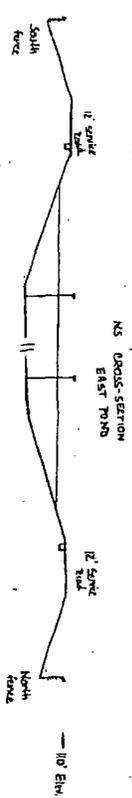
NS CROSS-SECTION WEST POND



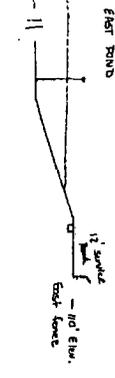
EW CROSS-SECTION WEST POND



NS CROSS-SECTION EAST POND



EW CROSS-SECTION EAST POND



## **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

**OIL CONSERVATION DIVISION**  
P.O. Box 2088  
Santa Fe, New Mexico 87504-2088

Permit No. \_\_\_\_\_  
(For Division Use Only)

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

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. 3

**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 [Signature]

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

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**Spill Prevention, Control, and Countermeasure Plan**

---

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San Juan Basin Gas Plant Telephone List  
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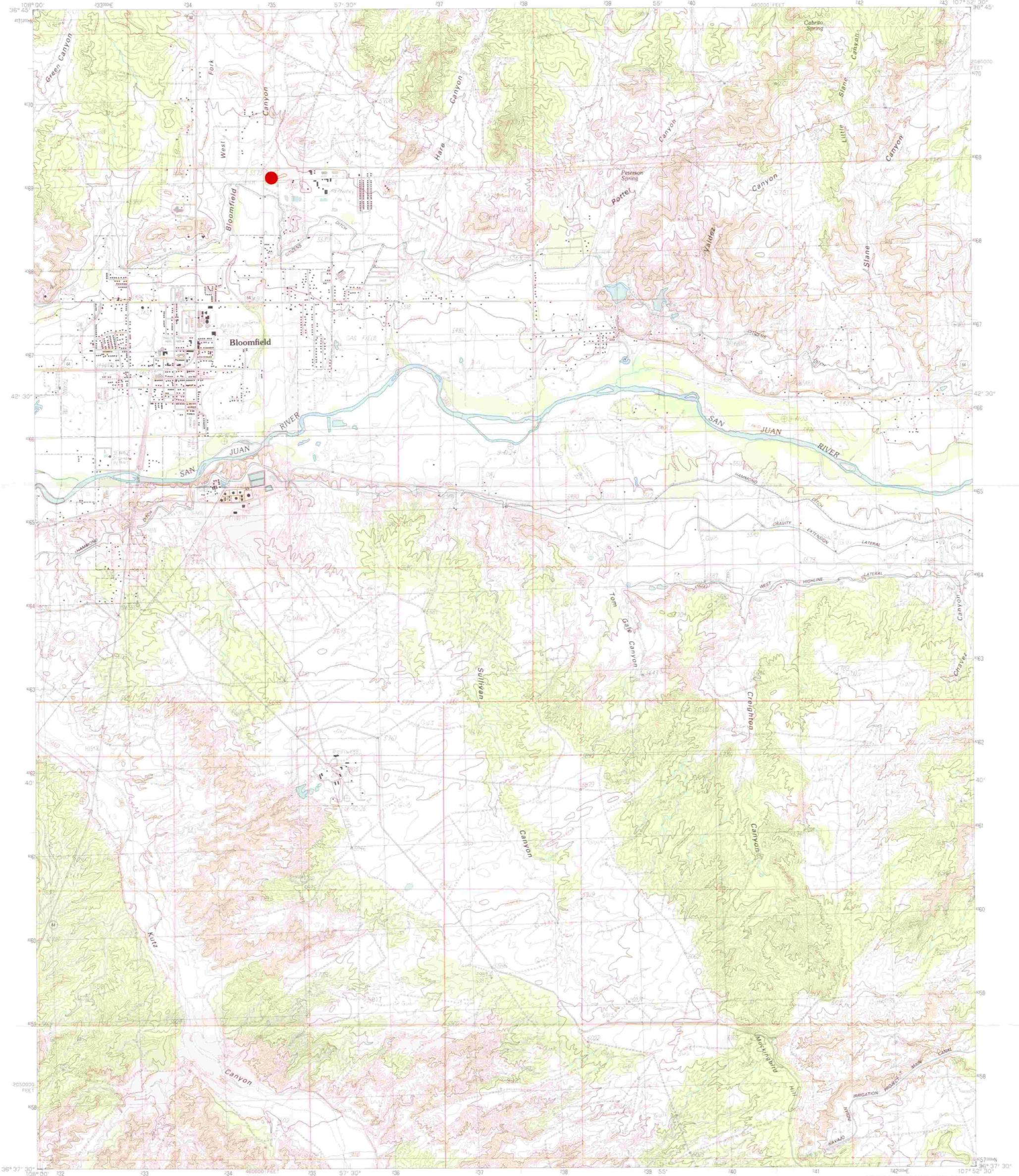
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    New Mexico

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PRODUCED BY THE UNITED STATES GEOLOGICAL SURVEY  
CONTROL BY USGS, NOS N04A  
COMPILED FROM AERIAL PHOTOGRAPHS TAKEN 1977  
FIELD CHECKED 1981 MAP EDITED 1985  
PROJECTION TRANSVERSE MERCATOR  
GRID: 1000-METER UNIVERSAL TRANSVERSE MERCATOR, ZONE 13  
10,000-FOOT STATE GRID TICKS NEW MEXICO, WEST ZONE  
UTM GRID DECLINATION 135 WEST  
1985 MAGNETIC NORTH DECLINATION 13 EAST  
VERTICAL DATUM NATIONAL GEODETIC VERTICAL DATUM OF 1929  
HORIZONTAL DATUM 1927 NORTH AMERICAN DATUM  
To place on the predicted North American Datum of 1983, move  
the projection lines as shown by dashed corner ticks  
(2 meters north and 56 meters east)  
There may be private inholdings within the boundaries of any  
Federal and State Reservations shown on this map

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



1	2	3	1 Flaca Vista
4	5	4	2 Arroyo
6	7	3	3 Turkey
		4	4 Horn Canyon
		5	5 Blanco
		6	6 Gallinas Trading Post
		7	7 East Fork Bear Canyon
		8	8 Huertano Peak

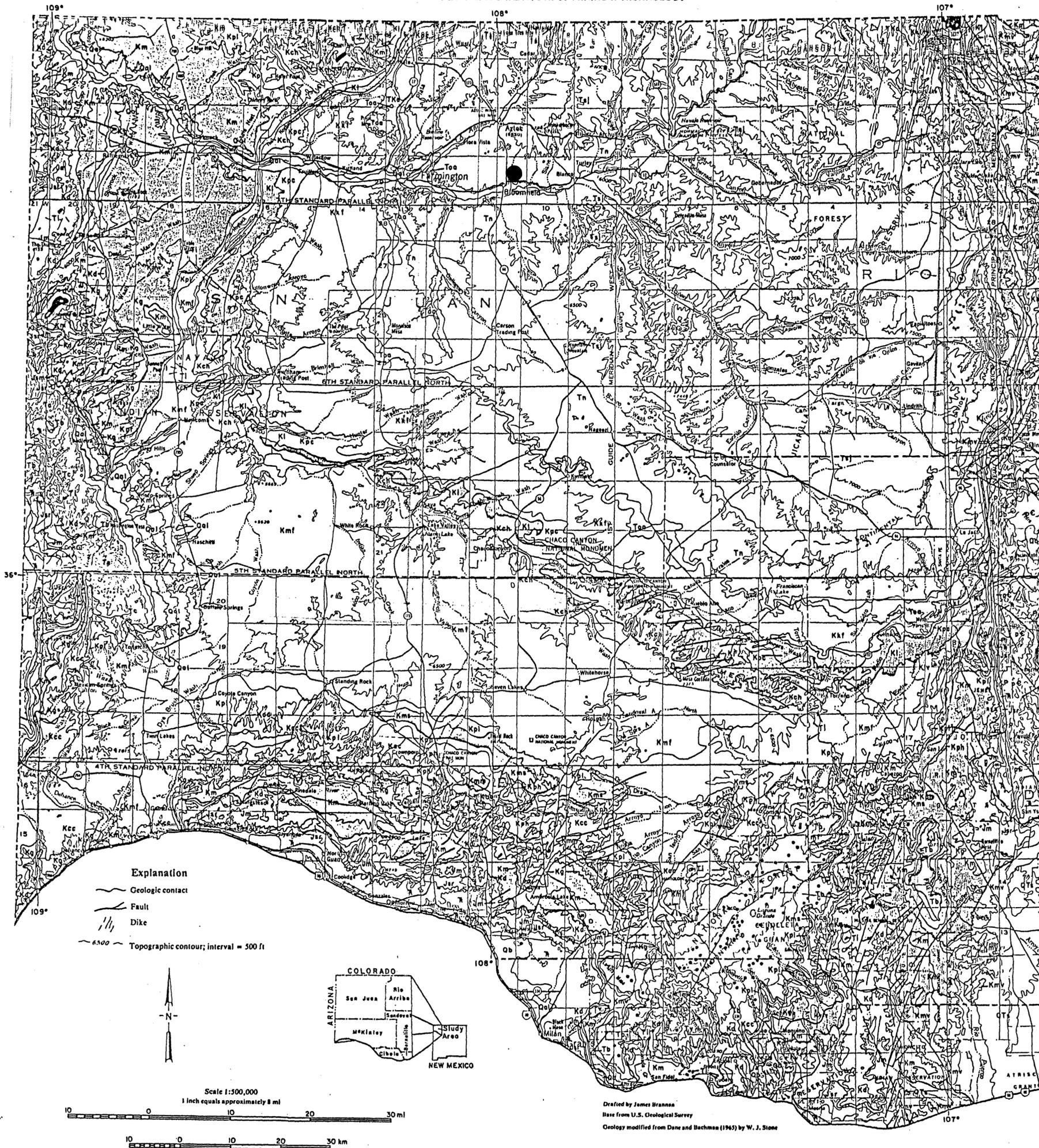
THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS  
FOR SALE BY U.S. GEOLOGICAL SURVEY, DENVER, COLORADO 80225  
OR RESTON, VIRGINIA 22092

**BLOOMFIELD, NEW MEXICO**  
PROVISIONAL EDITION 1985

**Appendix L**

**Hydrological Map of the  
San Juan Basin, New Mexico**

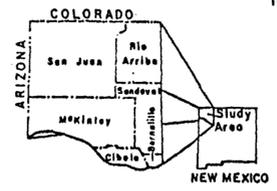
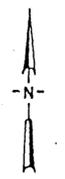
**The blue dot marks the approximate location of the San Juan Basin Gas Plant.**



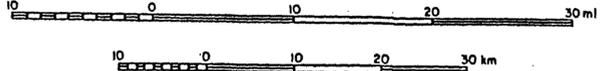
- GEOLOGIC UNITS**  
(see text for descriptions)
- Quaternary**
- Qal Alluvium; includes landslide deposits (east side of Chuska Mountains), terrace deposits (San Juan River valley)
  - Qb Basalt
- Quaternary/Tertiary**
- Qts Santa Fe Group and younger alluvium, undifferentiated (Rio Grande valley)
- Tertiary**
- Tl Intrusions, dikes
  - Tb Basalt
  - Tv Volcanics other than basalt
  - Tc Chuska Sandstone
  - Tsj San Jose Formation
  - Tn Naclimento Formation
  - Toa Ojo Alamo Sandstone
- Tertiary/Cretaceous**
- Tka Animas Formation
- Cretaceous**
- Kkf Fruitland Formation-Kirtland Shale, undifferentiated
  - Kpc Pictured Cliffs Sandstone
  - Kl Lewis Shale
  - Kmv Mesaverde Group, undifferentiated
  - \*Kch Cliff House Sandstone
  - \*Klv La Ventana Tongue, Cliff House Sandstone
  - \*Kmf Menefee Formation
  - \*Kpl Point Lookout Sandstone
  - Kms Satan Tongue, Mancos Shale
  - \*Kph Hosta Tongue, Point Lookout Sandstone
  - \*Kcc Crevasse Canyon Formation
  - Kmm Mulatto Tongue, Mancos Shale
  - \*Kg Gallup Sandstone
  - Km Mancos Shale, undifferentiated
  - Kd Dakota Sandstone; includes Burro Canyon Formation (northeast)
  - \*jn Mesaverde Group
- Jurassic**
- jm Morrison Formation
  - jsr San Rafael Group, undifferentiated; includes Entrada Sandstone, Todilto Limestone, Summerville Formation, Cow Springs Sandstone/Bluff Sandstone, in ascending order
- Triassic**
- T Triassic rocks, undifferentiated; includes Chinle Formation and overlying Glen Canyon Group
- Paleozoic**
- P Permian rocks, undifferentiated; includes Abo Formation (south), lower Cutler Formation (north), DeChelly Sandstone, Yeso Formation, Glorieta Sandstone, San Andres Limestone, in ascending order
  - P Pennsylvanian rocks, undifferentiated; includes Moias Formation, Pinkerton Trail Formation, Paradox Formation (northwest), Honaker Trail Formation, in ascending order
- Precambrian**
- pC Precambrian rocks, undifferentiated
- WATER-YIELDING CHARACTERISTICS\***
- Aquifer
  - Locally an aquifer or contains aquifer
  - Aquitard
  - Poorly known or outside study area
- \*See table 14 (inside front cover) for summary of aquifer characteristics

**Explanation**

- Geologic contact
- Fault
- Dike
- Topographic contour; interval = 500 ft



Scale 1:500,000  
1 inch equals approximately 8 mi



Drafted by James Brannon  
Base from U.S. Geological Survey  
Geology modified from Dane and Bachman (1965) by W. J. Stone

Hydrogeologic map of the San Juan Basin, New Mexico



Conoco Inc.  
San Juan Gas Plant  
P.O. Box 217  
Bloomfield, NM 87413  
(505) 632-4900

December 17, 2001

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. 7099 3220 0010 2242 6898**

RECEIVED  
DEC 26 2001  
Environmental Bureau  
Oil Conservation Division

NMOCD  
Mr. Wayne Price  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Dear Mr. Price:

This letter is in response to the Discharge Plan Approval Conditions for Discharge Plan GW-035 dated October 26<sup>th</sup>, 2001.

Condition 8. We are on an annual schedule of testing our below grade tanks/sumps. The test results for this year are attached.

Condition 9. We are on a 5 year schedule for testing our underground process/wastewater lines. The plant drain line systems are not due again until September 2002 and the wastewater pipeline between the San Juan Plant and Basin Disposal is not due for re-test until May of 2005. We will notify OCD at least 72 hours prior to testing.

Condition 14. The primary (top) liner in both East and West pond were determined to be leaking. The ponds were drained and cleaned. After inspection of the primary liner and considering the age of the liners, a plan was initiated to replace both liners in both ponds. The primary liner is now a 60 ml HDPE (High Density Poly Ethylene) liner and the secondary is a 40 ml HDPE. We will continue to check the ponds on a monthly basis for leak detection as specified in condition 17 of the Discharge plan.

Also enclosed you will find a signed copy of the Discharge Plan Approval Conditions.

Thank you for your assistance.

Sincerely,

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

Attachments: (2)  
Cc: Environmental file # 215-5-3



---

## Interoffice Communication

To Environmental File 219-10

From Richard R. Theander

Date December 6, 2001

Subject **Underground Storage Vessel Pressure Tests**

As requested by the New Mexico Oil Conservation District, V-806 Amine Drain Tank, V-807 Amine/Wastewater Drain Tank and V-1401 Lube Oil Drain Tank were pressure tested with air to three (3) PSI above normal operating pressure. I contacted Mr. Denny G. Foust by phone to share that and invited him to witness. He declined to visit. He asked me to proceed with the test and proper documentation.

A handwritten signature in cursive script that reads "Richard R. Theander".

Richard R. Theander  
Maintenance Foreman  
San Juan Gas Plant

CONOCO, INC.  
SAN JUAN GAS PLANT

HYDROSTATIC PRESSURE TESTING

Date: 12/3/01 Inspector: Rick

System or Equipment Being Tested: Amine Drain tank

Plant ID Number: 200 Vessel or Equipment Serial No: V-806

Maximum Working Pressure: 24#

Test Pressure: 4# (Maximum Working Pressure X 1.5)

Time	PSIG	Temp. °F
<u>12:30 PM</u>	<u>3 1/2 #</u>	<u>50</u>
<u>12:45 PM</u>	<u>3 1/2 #</u>	<u>50</u>
<u>1 PM</u>	<u>3 1/2 #</u>	<u>50</u>
<u>1:15 PM</u>	<u>3 1/2 #</u>	<u>50</u>
<u>1:30 PM</u>	<u>3 1/2 #</u>	<u>50</u>

Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

=====  
Circulate: Process Foreman [Signature]  
Maintenance Foreman Richard B. Theander  
Plant Manager Jan Ayers 12-12-01

CONOCO, INC.  
SAN JUAN GAS PLANT

HYDROSTATIC PRESSURE TESTING

Date: 12/13/01 Inspector: Rick Imel / KERRY BROUSSARD

System or Equipment Being Tested: amine sump

Plant ID Number: 800 Vessel or Equipment Serial No: V 807

Maximum Working Pressure: 24 #

Test Pressure: 4 # (Maximum Working Pressure X 1.5)

Time	PSIG	Temp. °F
<u>11:15 AM</u>	<u>4 #</u>	<u>45</u>
<u>11:30 AM</u>	<u>4 #</u>	<u>45</u>
<u>11:45 AM</u>	<u>4 #</u>	<u>44</u>
<u>12:00 PM</u>	<u>4 #</u>	<u>44</u>
<u>12:15 PM</u>	<u>4 #</u>	<u>44</u>

Comments: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

-----  
Circulate: Process Foreman Jim Cobb  
Maintenance Foreman Richard R. Shearer  
Plant Manager Lawrence 12/12/01

CONOCO, INC.  
SAN JUAN GAS PLANT

HYDROSTATIC PRESSURE TESTING

Date: 12/3/01

Inspector: Richard D. Beussard

System or Equipment Being Tested: Udel Lube oil tank

Plant ID Number: 1400

Vessel or Equipment Serial No: V-1401

Maximum Working Pressure: 24#

Test Pressure: 3# (Maximum Working Pressure X 1.5)

<u>Time</u>	<u>PSIG</u>	<u>Temp. °F</u>
<u>2:00 PM</u>	<u>4</u>	<u>51</u>
<u>2:15 PM</u>	<u>4</u>	<u>51</u>
<u>2:30 PM</u>	<u>4</u>	<u>51</u>
<u>2:45 PM</u>	<u>4</u>	<u>52</u>
<u>3:00 PM</u>	<u>4</u>	<u>52</u>

Comments: \_\_\_\_\_

=====  
Circulate: Process Foreman [Signature]  
Maintenance Foreman Richard D. Beussard  
Plant Manager Joe Ayer 12/12/01



---

## Interoffice Communication

To Environmental File 215-5-5

From Richard R. Theander

Date October 31, 2001

Subject **Inspection Of M-1402 Oil / Water Skimmer Pit**

As requested by the New Mexico Oil Conservation District, The Oil / Water Skimmer Pit was drained to allow a thorough inspection of the floor and walls for cracks or potential leak sources. This inspection was performed by Terry Broussard, Maintenance Technician I on 10/31/01. No problems were found.

A handwritten signature in cursive script that reads "Richard R. Theander".

Richard R. Theander  
Maintenance Foreman  
San Juan Gas Plant

# SERVICE LOG

**JOB DESC:** INSPECT OIL/WATER SKIMMER PIT  
@PRINT SAFETY

**JOB ID:** PM-2118-AF

**COMPLETION DATE:** 10/31/2001  
**ATTENTION REQ'D?**   
**PLANNED?**   
**METER:** 0  
**DN TIME:** 0:00  
**CAUSE:** PM

**COMPONENT:**

**EQUIP ID:** M-1402  
**NAME:** OIL/WATER SKIMMER PIT

**BLDG:**  
**COST CTR:** **ACCOUNT:**  
**LEAD SHOP:**

	ACTUAL	EST'D	NOTE:
LABOR HRS:	0:00	0:00	
LABOR COSTS:	0.00		
PARTS COSTS:	0.00	0.00	
TOTAL COSTS:	0.00		

## LABOR

#	DATE	SHOP	NAME	HRS	RATE	OT	FACTOR	S/D	PREMIUM
1	10/31/2001		TERRY		\$21.84				0.00

## PARTS USED

#	PART NO.	QTY	NAME	UNIT COST	QOH
---	----------	-----	------	-----------	-----

## Comments

I inspected the skimmer pit and found no visible signs of cracks or any other signs of wear. signed terry B.

AFFIDAVIT OF PUBLICATION

Ad No. 44945

STATE OF NEW MEXICO  
County of San Juan:

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

Thursday, August 30, 2001.

And the cost of the publication is \$197.98.

Connie Pruitt

ON 8/31/01 CONNIE PRUITT appeared  
before me, whom I know personally to be the  
person who signed the above document.

Gusny Beck

My Commission Expires April 02, 2004

cc: MADLEY

COPY OF PUBLICATION

918

Legals

NOTICE OF PUBLICATION

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

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

(GW-077) - Burlington Resources, Greg Wurtz, Environmental Representative, P.O. Box 4289, Farmington, New Mexico 87499-4289, has submitted a discharge plan renewal application for their Middle Mesa Natural Gas Compressor Station located in the SW/4 SW/4 of Section 10, Township 31 North, Range 7 West, NMPM, San Juan County, New Mexico. Natural gas products, waste oil and water is stored in above ground tanks prior to being transported off-site to OCD approved facilities. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 150-200 feet with an estimated total dissolved solids concentration of approximately 1400 mg/l. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

(GW-239) - Burlington Resources, Greg Wurtz, Environmental Representative, P.O. Box 4289, Farmington, New Mexico 87499-4289, has submitted a discharge plan renewal application for their Quinn Natural Gas Compressor Station located in the NW/4 SW/4 of Section 16, Township 31 North, Range 8 West, NMPM, San Juan County, New Mexico. Natural gas products, waste oil and water is stored in above ground tanks prior to being transported off-site to OCD approved facilities. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 250 feet with an estimated total dissolved solids concentration of approximately 1700 mg/l. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

(GW-255) - Burlington Resources, Greg Wurtz, Environmental Representative, P.O. Box 4289, Farmington, New Mexico 87499-4289, has submitted a discharge plan renewal application for their Buena Vista Natural Gas Compressor Station located in the NW/4 NE/4 of Section 13, Township 30 North, Range 9 West, NMPM, San Juan County, New Mexico. Natural gas products, waste oil and water is stored in above ground tanks prior to being transported off-site to OCD approved facilities. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 30 feet with an estimated total dissolved solids concentration of approximately 1100 mg/l. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

(GW-258) - Burlington Resources, Greg Wurtz, Environmental Representative, P.O. Box 4289, Farmington, New Mexico 87499-4289, has submitted a discharge plan renewal application for their Cedar Hill Natural Gas Compressor Station located in the SW/4 SW/4 of Section 29, Township 32 North, Range 10 West, NMPM, San Juan County, New Mexico. Natural gas products, waste oil and water is stored in above ground tanks prior to being transported off-site to OCD approved facilities. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 250 feet with an estimated total dissolved solids concentration of approximately 1100 mg/l. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be

And the cost of the publication is \$197.98.

Connie Pruitt

ON 8/31/01 CONNIE PRUITT appeared before me, whom I know personally to be the person who signed the above document.

Genny Beck  
My Commission Expires April 02, 2004

cc: Matt

Natural Gas Compressor Station of Section 16, Township 31 North, Range 8 West, NMPM, San Juan County, New Mexico. Natural gas products, waste oil and water is stored in above ground tanks prior to being transported off-site to OCD approved facilities. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 250 feet with an estimated total dissolved solids concentration of approximately 1700 mg/l. The discharge plan addresses how oilfield products and waste will be properly handled, stored, and disposed of, including how spills, leaks, and other accidental discharges to the surface will be managed in order to protect fresh water.

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(GW-35) - Conoco, Inc., Mr. Lane Ayers, (505)-632-4906, P.O. Box 217 Bloomfield, New Mexico 87413, 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 790,950 gallons per month of waste water is 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.

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 21st day of August 2001.

STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

SEAL

LORI WROTENBERY, Director

Legal No. 44945, published in The Daily Times, Farmington, New Mexico, Thursday, August 30, 2001.

THE SANTA FE  
**NEW MEXICAN**  
Founded 1849

NEW MEXICO OIL CONSERVATION DIVISION  
ATTN: WAYNE PRICE  
1220 S. ST. FRANCIS DRIVE  
SANTA FE, NM 87505

AD NUMBER: 224378      ACCOUNT: 56689  
LEGAL NO: 69935      P.O.#: 02199000249  
734 LINES      1 time(s) at \$ 323.54  
AFFIDAVITS:      5.25  
TAX:      20.55  
TOTAL:      349.34

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO

COUNTY OF SANTA FE

I, MM Weideman being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication #69935 a copy of which is hereto attached was published in said newspaper 1 day(s) between 08/30/2001 and 08/30/2001 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 30 day of August, 2001 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/s/ MM Weideman  
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this  
30 day of August A.D., 2001

Notary Laura E. Harding  
Commission Expires 11/23/02

Approved  
W.P. 7/19/01

**NOTICE OF PUBLICATION**

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of approximately 10 feet with a total dissolved solids concentration of approximately 2,500 mg/l, and in the pond area ground water is at a depth of 5 to 10 feet with a total dissolved solids concentration of approximately 6,000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed including methods and procedures for handling products, waste, waste water management, and site investigation/abatement plans.

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STATE OF NEW MEXICO OIL CONSERVATION DIVISION  
LORI WROTENBERY, Director  
Legal #69935  
Pub. August 30, 2001



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**GARY E. JOHNSON**  
Governor  
**Jennifer A. Salisbury**  
Cabinet Secretary

**Lori Wrotenbery**  
Director  
Oil Conservation Division

## NOTICE OF PUBLICATION

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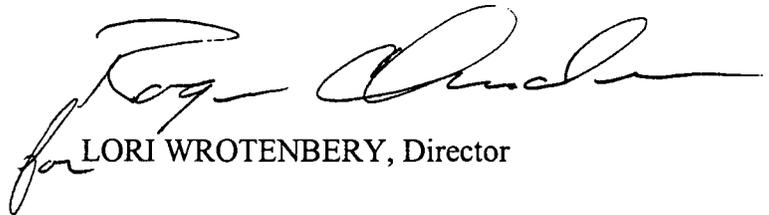
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STATE OF NEW MEXICO  
OIL CONSERVATION DIVISION

  
for LORI WROTENBERY, Director

SEAL



GENERATOR'S WASTE PROFILE SHEET

PLEASE PRINT IN INK OR TYPE

Service Agreement on File?  YES  NO
 Hazardous  Non-Hazardous  TSCA

Profile Number: WMI 266209
Renewal Date: 8-1-2000

A. Waste Generator Information

1. Generator Name: CONOCO San Juan Gas Processing Plant 2. SIC Code: 8122/2003
3. Facility Street Address: 61 CR 4900 4. Phone: (505) 632-4900
5. Facility City: Bloomfield 6. State/Province:
7. Zip/Postal Code: 87413 8. Generator USEPA/Federal ID #:
9. County: San Juan 10. State/Province ID #:
11. Customer Name: CONOCO 12. Customer Phone:
13. Customer Contact: Lane Myers 14. Customer Fax:
15. Billing Address: P.O. Box 217 Bloomfield, NM 87413  Same as above

B. Waste Stream Information

1. Description
a. Name of Waste: Molecular Sieve
b. Process Generating Waste: Prevents Hydrate formation within the plant process

Table with 5 columns: c. Color, d. Strong odor (describe), e. Physical state @ 70°F (Solid, Liquid, Gas, Sludge, Other), f. Layers (Single Layer, Multi-layer), g. Free liquid range to %, h. pH: Range to %

l. Liquid Flash Point:  <73°F  73-99°F  100-139°F  140-199°F  ≥ 200°F  Not applicable

j. Chemical Composition (List all constituents [including halogenated organics, debris, and UMC's] present in any concentration and submit representative analysis):

Table with 4 columns: Constituents, Concentration Range, Constituents, Concentration Range

TOTAL COMPOSITION MUST EQUAL OR EXCEED 100%

k.  Oxidizer  Pyrophoric  Explosive  Radioactive
 Carcinogen  Infectious  Shock Sensitive  Water Reactive

l. Does the waste represented by this profile contain any of the carcinogens which require OSHA notification? (list in Section B.1.j).....  YES  NO
m. Does the waste represented by this profile contain dioxins? (list in Section B.1.j).....  YES  NO
n. Does the waste represented by this profile contain asbestos?.....  YES  NO
If yes.....  friable  non-friable
o. Does the waste represented by this profile contain benzene?.....  YES  NO
If yes, concentration \_\_\_\_\_ ppm
Is the waste subject to the benzene waste operations NESHAP?.....  YES  NO
p. Is the waste subject to RCRA Subpart CC controls?.....  YES  NO
If yes, volatile organic concentration \_\_\_\_\_ ppmw
q. Does the waste contain any Class I or Class II ozone-depleting substances?.....  YES  NO
r. Does the waste contain debris? (list in Section B.1.j).....  YES  NO

2. Quantity of Waste

Estimated Annual Volume 90  Tons  Yards  Drums  Other (specify)

3. Shipping Information

a. Packaging:
 Bulk Solid; Type/Size: \_\_\_\_\_  Bulk Liquid; Type/Size: \_\_\_\_\_
 Drum; Type; Size: \_\_\_\_\_  Other: \_\_\_\_\_
b. Shipping Frequency: Units \_\_\_\_\_ Per:  Month  Quarter  Year  One time  Other
c. Is this a U.S. Department of Transportation (USDOT) Hazardous Material? (If no, skip d, e. and f).....  YES  NO



### GENERATOR'S WASTE PROFILE SHEET

PLEASE PRINT IN INK OR TYPE

266209

- d. Reportable Quantity (lbs.; kgs.): \_\_\_\_\_
- e. Hazard Class/ID #: \_\_\_\_\_
- f. USDOT Shipping Name: \_\_\_\_\_
- g. Personal Protective Equipment Requirements: \_\_\_\_\_
- h. Transporter/Transfer Station: \_\_\_\_\_

**C. Generator's Certification** (Please check appropriate responses, sign and date below.)

1. Is this a USEPA hazardous waste (40 CFR Part 261)? If the answer is no, skip to 2.  YES  NO
  - a. If yes, identify ALL USEPA listed and characteristic waste code numbers (D, F, K, P, U) \_\_\_\_\_
  - b. If a characteristic hazardous waste, do underlying hazardous constituents (UHCs) apply? (if yes, list in Section B.1.)  YES  NO
  - c. Does this waste contain debris? (if yes, list size and type in Chemical Composition - B.1.)  YES  NO
2. Is this a state hazardous waste?  YES  NO  
Identify ALL state hazardous waste codes \_\_\_\_\_
3. Is the waste from a CERCLA (40 CFR 300, Appendix B) or state mandated clean-up?  YES  NO  
If yes, attach Record of Decision (ROD), 104/106 or 122 order or court order that governs site clean-up activity. For state mandated clean-up, provide relevant documentation.
4. Does the waste represented by this waste profile sheet contain radioactive material, or is disposal regulated by the Nuclear Regulatory Commission?  YES  NO
5. Does the waste represented by this waste profile sheet contain concentrations of Polychlorinated Biphenyls (PCBs) regulated by 40 CFR 761? (if yes, list in Chemical Composition - B.1.)  YES  NO
  - a. If yes, were the PCBs imported into the U.S.?  YES  NO
6. Do the waste profile sheet and all attachments contain true and accurate descriptions of the waste material, and has all relevant information within the possession of the Generator regarding known or suspected hazards pertaining to the waste been disclosed to the Contractor?  YES  NO
7. Will all changes which occur in the character of the waste be identified by the Generator and disclosed to the Contractor prior to providing the waste to the Contractor?  YES  NO

Check here if a Certificate of Destruction or Disposal is required.

Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. I authorize WMI to obtain a sample from any waste shipment for purposes of recertification. If this certification is made by a broker, the undersigned signs as authorized agent of the generator and has confirmed the information contained in this Profile Sheet from information provided by the generator and additional information as it has determined to be reasonably necessary. If approved for management, Contractor has all the necessary permits and licenses for the waste that has been characterized and identified by this approved profile.

Certification Signature: Jan Ayers Title: Plant Manager  
 Name (Type or Print): LARRY AYERS Company Name: Covaco Inc Date: 8-19-97  
 Check if additional information is attached. Indicate the number of attached pages \_\_\_\_\_

D. WMI Management's Decision			FOR WMI USE ONLY
1.	Management Method <input checked="" type="checkbox"/> Landfill <input type="checkbox"/> Non-hazardous Solidification <input type="checkbox"/> Bioremediation <input type="checkbox"/> Incineration <input type="checkbox"/> Hazardous Stabilization <input type="checkbox"/> Other (Specify)		
2.	Proposed Ultimate Management Facility: <u>San Juan Regional Landfill</u>		
3.	Precautions, Special Handling Procedures, or Limitation on Approval: <u>No free liquids</u>		
4.	Waste Form _____	5. Source _____	6. System Type <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
Special Waste Decision: _____			Date: _____
Salesperson's Signature: _____			Date: _____
Division Approval Signature (Optional): <u>[Signature]</u>			Date: <u>8/22/97</u>
Special Waste Approvals Person Signature: _____			Date: _____

- To Landfill  To File \_\_\_\_\_ Tracking Sheet
- To Dispatch  Update Account  S/A to Landfill N/A



NEW MEXICO ENERGY, MINERALS and  
NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON  
Governor  
Jennifer A. Salisbury  
Cabinet Secretary

July 09, 2001

Lori Wrotenbery  
Director  
Oil Conservation Division

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

**RE: Solid Waste, cooling water pond sediment  
Generator, Conoco, Inc.  
Disposal Location, New Mexico Environment Department RCRA Subtitle D Solid  
Waste Facility**

Dear Mr. Colomb:

The New Mexico Oil Conservation Division (OCD) has received Conoco's request dated April 03, 2001 with subsequent analytical data to dispose of cooling water pond sediment at a landfill permitted by the New Mexico Environment Department. The OCD has reviewed the request and data and hereby approves the above-referenced solid waste pursuant to OCD Rule 712.D.3.n.

Please be advised that our approval does not relieve Conoco of liability should your operation result in pollution of surface water, ground water, or the environment. In addition, OCD approval does not relieve Conoco 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 Martyne Kieling at (505) 476-3488 or Wayne Price at (505) 476-3487.

Sincerely,

Roger C. Anderson  
Environmental Bureau Chief

RCA/lwp

Cc: Aztec OCD Office  
Don Beardsley, NMED SWB



**Conoco Inc.**  
San Juan Gas Plant  
P.O. Box 217  
Bloomfield, NM 87413  
(505) 632-4900

August 2, 2001

NMOCD  
Mr. Wayne Price  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

**RE: Discharge Plan Addendum  
San Juan Basin Gas Plant GW-035  
San Juan County, New Mexico**

Mr. Price,

This is a request for an addendum to the submitted San Juan Basin Gas Plant discharge plan, GW-035. The addendum is to incorporate Rule 19 NMAC 15.9.712 as part of the discharge plan.

Thank you for your assistance.

Sincerely,

A handwritten signature in cursive script, appearing to read "F. P. Micky Colomb".

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

xc: File



GARY E. JOHNSON  
GOVERNOR

*State of New Mexico*  
**ENVIRONMENT DEPARTMENT**  
*Solid Waste Bureau*  
*Harold Runnels Building*  
*1190 St. Francis Drive, P.O. Box 26110*  
*Santa Fe, New Mexico 87502-6110*  
*Telephone (505) 827-0197*  
*Fax (505) 827-2902*



PETER MAGGIORE  
SECRETARY

PAUL R. RITZMA  
DEPUTY SECRETARY

June 18, 2001

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

Dear Mr. Colomb:

The Solid Waste Bureau has reviewed your request for clarification of the New Mexico Solid Waste Regulations regarding the proposed disposal of cooling water pond sediment. The Bureau has no problem with the sediment as you have described, with one exception. The exception is the requirement in the Regulations that no waste be accepted at a landfill that does not pass paint filter test. The purpose of that stricture is to exclude bulk liquids from the landfills. Therefore, if the sediment does indeed pass the paint filter test, it may be disposed of at the San Juan County Landfill, upon their approval.

If I may be of any further assistance to you with this topic, or any others, please call me at 505-827-2863.

Sincerely,

Dan Fuqua, WRES-I  
NMED, SWB, Permitting

DFF/dff

cc: Chuck Akeley, SWB, NMED District I, Albuquerque  
Tom Skibitski, Manager, NMED District I, Albuquerque



NEW MEXICO ENERGY, MINERALS and  
NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON  
Governor  
Jennifer A. Salisbury  
Cabinet Secretary

June 15, 2001

Lori Wrotenberg  
Director  
Oil Conservation Division

Mr. Don Lostak  
Cococo Inc.  
P.O. Box 217  
Bloomfield, NM 87413

**RE: Solid Waste, Used Sulfa-Clean  
Generator, Conoco, Inc.  
Disposal Location, New Mexico Environment Department RCRA Subtitle D Solid  
Waste Facility**

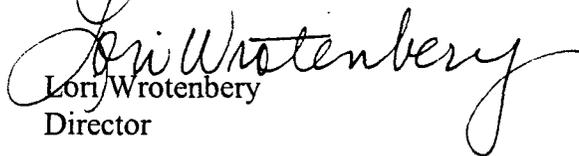
Dear Mr. Lostak:

The New Mexico Oil Conservation Division (OCD) has received Conoco's request dated March 11, 1998, with subsequent analytical data dated March 30, 2001, to dispose used Sulfa-Clean at a landfill permitted by the New Mexico Environment Department. The OCD has reviewed the request and data and hereby approves the above-referenced solid waste pursuant to OCD Rule 712.D.3.n.

Please be advised that our approval does not relieve Conoco of liability should your operation result in pollution of surface water, ground water, or the environment. In addition, OCD approval does not relieve Conoco 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 Martyne Kieling at (505) 476-3488.

Sincerely,

  
Lori Wrotenberg  
Director

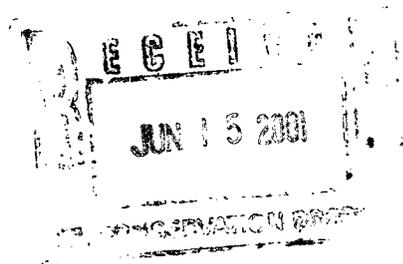
LW/mjk

xc with attachments:

Hobbs OCD Office  
Artesia OCD Office  
Aztec OCD Office  
Santa Fe OCD Office  
Don Beardsley, NMED SWB  
Charles A. Hules, NMED SWB



Conoco Inc.  
San Juan Gas Plant  
P.O. Box 217  
Bloomfield, NM 87413  
(505) 632-4900



June 12, 2001

NMOCD  
Mr. Wayne Price  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Dear Mr. Price:

In response to your e-mail dated June 01, 2001, the pond sediment is a RCRA non-hazardous waste.

I have also sent a letter to Mr. Don Beardsley with NMED requesting disposal approval.

Thank you again for your assistance.

Sincerely,

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

xc: File  
cc: Denny Foust



Conoco Inc.  
San Juan Gas Plant  
P.O. Box 217  
Bloomfield, NM 87413  
(505) 632-4900

April 16, 2001

NMOCD  
Mr. Denny Foust  
1000 Rio Brazos Road  
Aztec, NM 87410

Dear Mr Foust:

This is a request for authorization of disposal of Activated Alumina generated at the Conoco San Juan Gas Plant in Bloomfield, NM. This Activated Alumina is from our EPBC Dryer system. The Activated Alumina will be disposed of at the San Juan County Regional Landfill under Waste Management profile number WMI CD 1444.

Enclosed you will find a copy of the TPH and BTEX analysis of the Activated Alumina.

Thank you for your assistance.

Sincerely,

A handwritten signature in cursive script, appearing to read "F.P. Colomb", is written over the typed name.

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

Enclosure  
xc: File



Phone (505) 326-4737 Fax (505) 325-4182

Inter-Mountain Laboratories, Inc.

2506 West Main Street, Farmington, NM 87401

April 6, 2001

Mick Colomb  
Conoco Inc.  
P.O. Box 217  
Bloomfield, NM 87413

Mr. Colomb:

Enclosed please find the reports for the sample received by our laboratory for analysis on March 29, 2001.

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

Thank you for choosing IML for your analytical needs!

Sincerely,

Sharon Williams  
Organics Lab Supervisor

Enclosure

xc: File



## CONOCO, INC.

### Case Narrative

On March 29, 2001, one sample was submitted to Inter-Mountain Laboratories - Farmington for analysis. Analysis for Benzene-Toluene-Ethylbenzene-Xylenes (BTEX); Total Petroleum Hydrocarbons (TPH), was performed on the sample as per the accompanying Chain of Custody document.

BTEX analysis on the sample was performed by EPA Method 5030, Purge and Trap, and EPA Method 8021B, Aromatic Volatile Hydrocarbons, using an Tekmar LSC 2000 Purge and Trap and a Hewlett-Packard 5890 Gas Chromatograph, equipped with a photoionization detector.

The TPH sample was extracted by Method 3510, "Separatory Funnel Liquid - Liquid Extraction", with 1,1,2-trichloro 1,2,2-trifluoroethane (Freon) as the extraction solvent. Analysis was by Method 418.1, "Total Recoverable Petroleum Hydrocarbons", using a Buck Scientific Infrared Spectrophotometer.

It is the policy of this laboratory to employ, whenever possible, preparatory and analytical methods which have been approved by regulatory agencies. The methods used in the analysis of the sample reported herein are found in "Test Methods for Evaluation of Solid Waste", SW-846, USEPA, 1986 and "Methods for Chemical Analysis of Water and Wastes", EPA-600/4-79-020, USEPA, 1983.

Quality control reports appear at the end of the analytical package and may be identified by title. If there are questions regarding the information presented in this package, please feel free to contact me at your convenience.

Sincerely,



Sharon Williams  
Organics Lab Supervisor

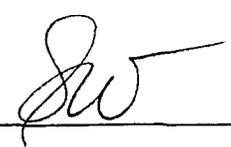
**Client:** Conoco, Inc. Bloomfield  
**Project:** Not Given  
**Sample ID:** Roll Off Box  
**Lab ID:** 0301W01503  
**Matrix:** Solid  
**Condition:** N/A

**Date Reported:** 04/04/01  
**Date Sampled:** 03/29/01  
**Date Received:** 03/29/01  
**Date Extracted:** N/A  
**Date Analyzed:** 04/04/01

Parameter	Analytical Result	PQL	Units
TPH - METHOD 418.1			
Total Petroleum Hydrocarbons 418.1	<20	20	mg/Kg

Reference: EPA - "Methods for Chemical Analysis of Water and Wastes (MCAWW)" - EPA/600/4-79-020 - March, 1983.

Reviewed By:   
William Lipps

Analyst: 

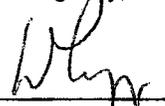
Client: Conoco, Inc. Bloomfield  
 Project: Not Given  
 Sample ID: Roll Off Box  
 Lab ID: 0301W01503  
 Matrix: Solid  
 Condition: N/A

Date Reported: 04/04/01  
 Date Sampled: 03/29/01  
 Date Received: 03/29/01  
 Date Extracted: N/A

Parameter	Analytical Result	PQL	Units
<b>BTEX - Method 8021B</b>			
Benzene	<50	50	ug/Kg
Toluene	<50	50	ug/Kg
Ethylbenzene	<50	50	ug/Kg
Xylenes (total)	<150	150	ug/Kg

Quality Control - Surrogate Recovery	%	QC Limits
4-Bromofluorobenzene(SUR-8021B)	100	70 - 130
a,a,a-Trifluorotoluene(SUR-8021B)	109	70 - 130

Reference: Method 8021b, Volatile Organic Compounds, Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, United States Environmental Protection Agency, SW-846, Volume IB.

Reviewed By:   
 William Lipps

Analyst: 

## Quality Assurance / Quality Control Total Petroleum Hydrocarbons

Client: **Conoco**  
 Project: Not Given  
 Matrix: Solid  
 Condition: Intact/Cool

Date Reported: 04/04/01  
 Date Sampled: 03/29/01  
 Date Received: 03/29/01  
 Date Extracted: 04/04/01  
 Date Analyzed: 04/04/01

### Duplicate Analysis

Lab ID	Sample Result	Dup Result	Units	% Difference
W01503	ND	ND	mg/Kg	0.00%

### Method Blank Analysis

Lab ID	Result	Units	Detection Limit
Method Blank	ND	mg/Kg	20.0

### Spike Analysis

Lab ID	Found Conc. mg/Kg	Sample Conc. mg/Kg	Spike Amount mg/Kg	Percent Recovery	Acceptance Limits
MB	494	ND	500	99%	70-130%

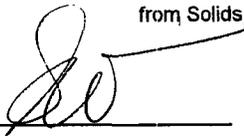
### Known Analysis

Lab ID	Found Conc. mg/Kg	Known Conc. mg/Kg	Percent Recovery	Acceptance Limits
QC	25.3	26.5	95%	70-130%

**Method 418.1:** Petroleum Hydrocarbons, Total Recoverable, USEPA Chemical Analysis of Water and Waste, 1978.

**Method 3550:** Ultrasonic Extraction of Non-Volatile and Semi-Volatile Organic Compounds from Solids, USEPA SW -846, rev.1, July 1992.

Reported By: \_\_\_\_\_



Reviewed By: \_\_\_\_\_





### GENERATOR'S WASTE PROFILE SHEET

PLEASE PRINT IN INK OR TYPE

Service Agreement on File?  YES  NO

Profile Number: WM **CD 1444**

Hazardous  Non-Hazardous  TSCA

Renewal Date: 4/12/2004

#### A. Waste Generator Information

- 1. Generator Name: CANOCO INC SAN JUAN GAS PLZ SIC Code: 1321
- 3. Facility Street Address: h) CR 4900 4. Phone: (505) 632 4900
- 5. Facility City: Bloomfield 6. State/Province: New Mexico
- 7. Zip/Postal Code: 87413 8. Generator USEPA/Federal ID #: \_\_\_\_\_
- 9. County: SAN JUAN 10. State/Province ID #: \_\_\_\_\_
- 11. Customer Name: CANOCO 12. Customer Phone: ( ) \_\_\_\_\_
- 13. Customer Contact: LARRY AYERS 14. Customer Fax: \_\_\_\_\_
- 15. Billing Address Po Box 217 Bloomfield NM 87413  Same as above

#### B. Waste Stream Information

- 1. Description
  - a. Name of Waste: ACTIVATED ALUMINA
  - b. Process Generating Waste: EPBC/PRODUCT DRYER - REMOVES WATER FROM PRODUCT

c. Color <u>Tan/White</u>	d. Strong odor (describe):	e. Physical state @ 70°F <input checked="" type="checkbox"/> Solid <input type="checkbox"/> Liquid <input type="checkbox"/> Gas <input type="checkbox"/> Sludge <input type="checkbox"/> Other	f. Layers <input type="checkbox"/> Single Layer <input type="checkbox"/> Multi-layer	g. Free liquid range to %
				h. pH: Range to %

l. Liquid Flash Point:  <73°F  73-89°F  100-139°F  140-199°F  ≥ 200°F  Not applicable

j. Chemical Composition (List all constituents including halogenated organics, debris, and UHC's present in any concentration and submit representative analysis):

Constituents	Concentration Range	Constituents	Concentration Range
<u>ATTACHED MSDS</u>			
<u>ATTACHED TPH TEST</u>			
<u>ATTACHED BTEX TEST</u>			

- k.  Oxidizer  Pyrophoric  Explosive  Radioactive  
 Carcinogen  Infectious  Shock Sensitive  Water Reactive NON-HAZARD SEE MSDS
- l. Does the waste represented by this profile contain any of the carcinogens which require OSHA notification? (list in Section B.1.j).....  YES  NO
- m. Does the waste represented by this profile contain dioxins? (list in Section B.1.j).....  YES  NO
- n. Does the waste represented by this profile contain asbestos?.....  YES  NO  
If yes.....  friable  non-friable
- o. Does the waste represented by this profile contain benzene?.....  YES  NO  
If yes, concentration \_\_\_\_\_ ppm  
Is the waste subject to the benzene waste operations NESHAP?.....  YES  NO
- p. Is the waste subject to RCRA Subpart CC controls?.....  YES  NO  
If yes, volatile organic concentration \_\_\_\_\_ ppmw
- q. Does the waste contain any Class I or Class II ozone-depleting substances?.....  YES  NO
- r. Does the waste contain debris? (list in Section B.1.j).....  YES  NO

2. Quantity of Waste  
Estimated Annual Volume 30  Tons  Yards  Drums  Other (specify) \_\_\_\_\_

- 3. Shipping Information
  - a. Packaging:
    - Bulk Solid; Type/Size: Roll off Boxes  Bulk Liquid; Type/Size: \_\_\_\_\_
    - Drum; Type; Size: \_\_\_\_\_  Other: \_\_\_\_\_
  - b. Shipping Frequency: Units \_\_\_\_\_ Per:  Month  Quarter  Year  One time  Other \_\_\_\_\_
  - c. Is this a U.S. Department of Transportation (USDOT) Hazardous Material? (if no, skip d, e, and f).....  YES  NO



# GENERATOR'S WASTE PROFILE SHEET

PLEASE PRINT IN INK OR TYPE

- d. Reportable Quantity (Rq.; kg-): \_\_\_\_\_ e. Hazard Class/ID #: \_\_\_\_\_
- f. USDOT Shipping Name: \_\_\_\_\_
- g. Personal Protective Equipment Requirements: \_\_\_\_\_
- h. Transporter/Transfer Station: \_\_\_\_\_

### C. Generator's Certification (Fill in)

1. Is this a USEPA hazardous waste (40 CFR Part 261)? If the answer is no, skip to 2.  YES  NO
  - a. If yes, identify ALL USEPA listed and characteristic waste code numbers (D, F, K, P, U) \_\_\_\_\_
  - b. If a characteristic hazardous waste, do underlying hazardous constituents (UHCs) apply? (If yes, list in Section B.1.J.)  YES  NO
  - c. Does this waste contain debris? (if yes, list size and type in Chemical Composition - B.1.)  YES  NO
2. Is this a state hazardous waste?  YES  NO  
Identify ALL state hazardous waste codes \_\_\_\_\_
3. Is the waste from a CERCLA (40 CFR 300, Appendix 6) or state mandated clean-up?  YES  NO  
If yes, attach Record of Decision (ROD), 104/106 or 122 order or court order that governs site clean-up activity. For state mandated clean-up, provide relevant documentation.
4. Does the waste represented by this waste profile sheet contain radioactive material, or is disposal regulated by the Nuclear Regulatory Commission?  YES  NO
5. Does the waste represented by this waste profile sheet contain concentrations of Polychlorinated Biphenyls (PCBs) regulated by 40 CFR 7617 (if yes, list in Chemical Composition - B.1.J.)  YES  NO
  - a. If yes, were the PCBs imported into the U.S.?  YES  NO
6. Do the waste profile sheet and all attachments contain true and accurate descriptions of the waste material, and has all relevant information within the possession of the Generator regarding known or suspected hazards pertaining to the waste been disclosed to the Contractor?  YES  NO
7. Will all changes which occur in the character of the waste be identified by the Generator and disclosed to the Contractor prior to providing the waste to the Contractor?  YES  NO

Check here if a Certificate of Destruction or Disposal is required.

Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. I authorize WMI to obtain a sample from any waste shipment for purposes of recertification. If this certification is made by a broker, the undersigned signs as authorized agent of the generator and has confirmed the information contained in this Profile Sheet from information provided by the generator and additional information as it has determined to be reasonably necessary. If approved for management, Contractor has all the necessary permits and licenses for the waste that has been characterized and identified by this approved profile.

Certification Signature: *Felix P. Colomb* Title: Process Foreman  
 Name (Type or Print): Felix P. Colomb Company Name: CONOCO INC Date: 4/12/01  
 Check if additional information is attached. Indicate the number of attached pages 6

WMI Management's Decision	FOR WMI USE ONLY
1. Management Method <input checked="" type="checkbox"/> Landfill <input type="checkbox"/> Non-hazardous Solidification <input type="checkbox"/> Bioremediation <input type="checkbox"/> Incineration <input type="checkbox"/> Hazardous Stabilization <input type="checkbox"/> Other (Specify) _____	
2. Proposed Ultimate Management Facility: <u>SAN JUAN COUNTY LANDFILL</u>	
3. Precautions, Special Handling Procedures, or Limitation on Approval: _____	
4. Waste Form _____	5. Source _____
6. System Type <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved	
Special Waste Decision: _____	
Salesperson's Signature: _____ Date: _____	
Division Approval Signature (Optional): _____ Date: _____	
Special Waste Approvals Person Signature: <u><i>J. Hamm</i></u> Date: <u>4-12-01</u>	



Conoco Inc.  
San Juan Gas Plant  
P.O. Box 217  
Bloomfield, NM 87413  
(505) 632-4900

REC'D  
APR 20 2001

April 17, 2001

NMOCD  
Mr. Wayne Price  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Dear Mr. Price:

This is a request for authorization of disposal of certain non-domestic waste listed in OCD rule 19.15.9.712 D1 and D2 which may be generated at the Conoco San Juan Gas Plant in Bloomfield, NM.

Disposal of waste is contingent on approved waste profile from Waste Management and be listed in our Discharge plan.

Thank you for your assistance.

Sincerely,

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

xc: File  
cc: Denny Foust



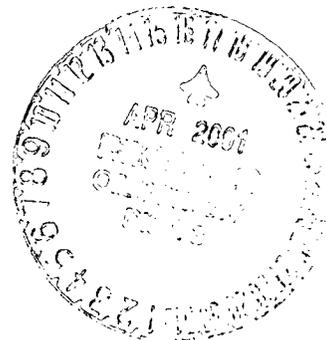
Roger Anderson

Conoco Inc.  
San Juan Gas Plant  
P.O. Box 217  
Bloomfield, NM 87413  
(505) 632-4900

Not an discharge  
plan.

April 16, 2001

NMOCD  
Mr. Denny Foust  
1000 Rio Brazos Road  
Aztec, NM 87410



Dear Mr Foust:

This is a request for authorization of disposal of Activated Alumina generated at the Conoco San Juan Gas Plant in Bloomfield, NM. This Activated Alumina is from our EPBC Dryer system. The Activated Alumina will be disposed of at the San Juan County Regional Landfill under Waste Management profile number WMI CD 1444.

Enclosed you will find a copy of the TPH and BTEX analysis of the Activated Alumina.

Thank you for your assistance.

Sincerely,

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

Enclosure  
xc: File

Client: Conoco, Inc. Bloomfield  
 Project: Not Given  
 Sample ID: Roll Off Box  
 Lab ID: 0301W01503  
 Matrix: Solid  
 Condition: N/A

Date Reported: 04/04/01  
 Date Sampled: 03/29/01  
 Date Received: 03/29/01  
 Date Extracted: N/A

Parameter	Analytical Result	PQL	Units
<b>BTEX - Method 8021B</b>			
Benzene	<50	50	ug/Kg
Toluene	<50	50	ug/Kg
Ethylbenzene	<50	50	ug/Kg
Xylenes (total)	<150	150	ug/Kg

Quality Control - Surrogate Recovery	%	QC Limits
4-Bromofluorobenzene(SUR-8021B)	100	70 - 130
a,a,a-Trifluorotoluene(SUR-8021B)	109	70 - 130



Reference: Method 8021b, Volatile Organic Compounds, Test Methods for Evaluating Solid Waste, Physical/Chemical Methods, United States Environmental Protection Agency, SW-846, Volume IB.

Reviewed By: William Lipps

William Lipps

Analyst: [Signature]

Client: Conoco, Inc. Bloomfield  
Project: Not Given  
Sample ID: Roll Off Box  
Lab ID: 0301W01503  
Matrix: Solid  
Condition: N/A

Date Reported: 04/04/01  
Date Sampled: 03/29/01  
Date Received: 03/29/01  
Date Extracted: N/A  
Date Analyzed: 04/04/01

Parameter	Analytical Result	PQL	Units
TPH - METHOD 418.1			
Total Petroleum Hydrocarbons 418.1	<20	20	mg/Kg

Reference: EPA - "Methods for Chemical Analysis of Water and Wastes (MCAWW)" - EPA/600/4-79-020 - March, 1983.

Reviewed By:

  
William Lipps

Analyst:

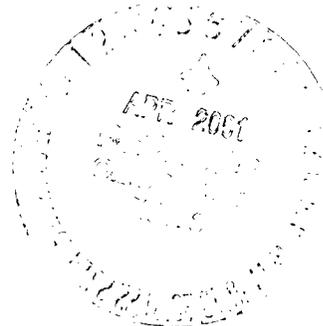




Roger  
Anderson

Conoco Inc.  
San Juan Gas Plant  
P.O. Box 217  
Bloomfield, NM 87413  
(505) 632-4900

April 3, 2001



NMOCD  
Mr. Denny Foust  
1000 Rio Brazos Road  
Aztec, NM 87410

Dear Mr Foust:

This is a request for authorization of disposal of cooling water evaporation pond sediment generated at the Conoco San Juan Gas Plant in Bloomfield, NM. This sediment is from our cooling water system which is a non-contact system with our process. The sediment will be disposed of at the San Juan County Regional Landfill under Waste Management profile #112398.

Enclosed you will find a copy of the TCLP analysis taken of the evaporation pond sediment.

Thank you for your assistance.

Sincerely,

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

Enclosure  
xc: File



# Flash Point

Client: **Conoco, Inc.**  
Project: East Water Treatment Pond  
Sample ID: Sample 1  
Laboratory ID: 0300W04363  
Sample Matrix: Soil  
Condition: Intact

Date Reported: 11/01/00  
Date Sampled: 10/03/00  
Date Received: 10/06/00  
Date Analyzed: 11/01/00

Parameter	Result	Units
Flash Point	>140	°F



**References:** Annual Book of ASTM Standards, Method D93-80.

Reported by: 

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

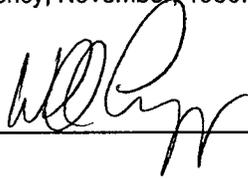


**Client:** Conoco, Inc. Bloomfield  
**Project:** East Water Treatment Pond  
**Sample ID:** Sample 2  
**Lab ID:** 0300W04363  
**Matrix:** Soil  
**Condition:** Cool/Intact

**Date Reported:** 10/30/00  
**Date Sampled:** 10/03/00  
**Date Received:** 10/06/00  
  
**Date Analyzed:** 10/23/00

Parameter	Analytical Result	PQL	MCL	Units
<b>METHOD 1311 - TCLP METALS</b>				
Arsenic	<0.1	0.1	5.0	mg/L
Barium	0.7	0.5	100	mg/L
Cadmium	<0.01	0.01	1.0	mg/L
Chromium	<0.02	0.02	5.0	mg/L
Lead	<0.1	0.1	5.0	mg/L
Mercury	<0.01	0.01	0.2	mg/L
Selenium	<0.1	0.1	1.0	mg/L
Silver	<0.05	0.05	5.0	mg/L

Reference: SW-846 - "Test Methods for Evaluating Solid Waste: Physical/Chemical Methods", United States Environmental Protection Agency, November, 1986.

Reviewed By:  \_\_\_\_\_



Phone (505) 326-4737 Fax (505) 325-4182

InterMountain Laboratories, Inc.

2506 West Main Street, Farmington, NM 87401

## **QUALITY CONTROL / QUALITY ASSURANCE**



Phone (505) 326-4737 Fax (505) 325-4182

Inter Mountain Laboratories, Inc.

2506 West Main Street, Farmington, NM 87401

# QUALITY CONTROL/QUALITY ASSURANCE

## KNOWN ANALYSIS

### Flash Point

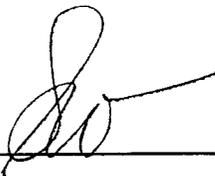
Client: **Conoco, Inc.**  
Project: East Water Treatment Pond  
Sample Matrix: Soil

Date Reported: 11/01/00  
Date Analyzed: 11/01/00  
Date Received: 10/06/00

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

**Reference:** Annual Book of ASTM Standards, Method D93-80.

**Comments:**

Reported by  \_\_\_\_\_

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



# Quality Control / Quality Assurance

## Spike Analysis / Blank Analysis

### TOXICITY CHARACTERISTIC LEACHING PROCEDURE

Client: **Conoco, Inc.**  
 Project: **East Water Treatment Pond**  
 Sample Matrix: **Extract**

Date Reported: **11/01/00**  
 Date Analyzed: **10/26/00**  
 Date Received: **10/06/00**

#### Spike Analysis

Parameter	Spike Result (mg/L)	Sample Result (mg/L)	Spike Added (mg/L)	Percent Recovery
Arsenic	0.10	<0.1	0.10	96%
Barium	1.00	<0.5	1.00	100%
Cadmium	0.03	<0.01	0.03	108%
Chromium	0.10	<0.02	0.10	100%
Lead	0.10	<0.1	0.10	102%
Mercury	0.002	<0.01	0.002	93%
Selenium	0.05	<0.1	0.05	98%
Silver	0.10	<0.05	0.10	100%

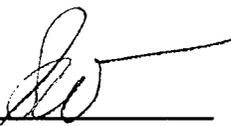
#### Method Blank Analysis

Parameter	Result	Detection Limit	Units
Arsenic	ND	0.1	mg/L
Barium	ND	0.5	mg/L
Cadmium	ND	0.01	mg/L
Chromium	ND	0.02	mg/L
Lead	ND	0.1	mg/L
Mercury	ND	0.01	mg/L
Selenium	ND	0.1	mg/L
Silver	ND	0.05	mg/L

References: Method 1311: Toxicity Characteristic Leaching Procedure, SW-846, Rev. 0, July 1992.

Method 3010A: Acid Digestion of Aqueous Samples and Extracts for Total Metals, SW-846, Rev. 1, July 1992.

#### Comments:

Reported by 

Reviewed by 



# Quality Control / Quality Assurance

## Known Analysis

### TOXICITY CHARACTERISTIC LEACHING PROCEDURE

Client: **Conoco, Inc.**  
 Project: **East Water Treatment Pond**  
 Sample Matrix: **Extract**

Date Reported: **11/01/00**  
 Date Analyzed: **10/26/00**  
 Date Received: **10/06/00**

#### Known Analysis

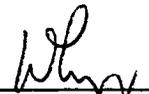
Parameter	Found Result	Known Result	Percent Recovery	Units
Arsenic	2.10	2.00	105%	mg/L
Barium	1.99	2.00	100%	mg/L
Cadmium	2.07	2.00	104%	mg/L
Chromium	2.01	2.00	101%	mg/L
Lead	2.02	2.00	101%	mg/L
Mercury	0.002	0.002	95%	mg/L
Selenium	2.11	2.00	105%	mg/L
Silver	0.25	0.25	98%	mg/L

**References:** Method 1311: Toxicity Characteristic Leaching Procedure, SW-846, Rev. 0, July 1992.

Method 3010A: Acid Digestion of Aqueous Samples and Extracts for Total Metals, SW-846, Rev. 1, July 1992.

**Comments:**

Reported by 

Reviewed by 

**DISCHARGE PLAN**  
**SAN JUAN BASIN GAS PLANT**  
**BLOOMFIELD, SAN JUAN COUNTY**

**June 2001**

Prepared by

Conoco Inc., Natural Gas & Gas Products Department  
San Juan Basin Gas Plant  
P.O. Box 217  
Bloomfield, NM 87413

**DISCHARGE PLAN  
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Appendices

- A. Wastewater Collection System Schematic Diagram
- B. Process Flow Diagram
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- D. Facility Plot Plan
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- F. Waste Management Practices Chart
- G. Underground Vessels
- H. Piping Specifications
- I. Evaporation Ponds Detail
- J. SPCC Table of Contents
- K. Hydrologic Formations
- L. Site Contour Map

## I. Type of Operation

San Juan Basin Gas Plant is a natural gas, cryogenic processing plant. The plant processes natural gas to remove and sell the liquids. The dry residue gas is returned to the El Paso Blanco facility.

Two natural gas streams are delivered from El Paso's Blanco Plant to the San Juan Processing Plant: (1), 180 MMSCFD at 350 psig and (2), 320 MMSCFD at 900 psig. Stream (1) is compressed at the San Juan 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. To remove free water, separators are used. 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), and then to the process wastewater tank (TK-1403). Stormwater and wash-water flow to the skimmer basin (M-1402), which is an oil-water separator. See Appendix A for a schematic of the wastewater system.

The dehydrated natural gas is then transferred to two parallel 250MMSCFD liquid extraction trains which direct the gas through a series of heat exchangers to reduce the temperature to approximately  $-100^{\circ}\text{F}$ . 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 turboexpander. A near isentropic expansion drops the vapor phase pressure to demethanizer pressure, both cooling the gas to  $-150^{\circ}\text{F}$  and delivering shaft work to the turboexpander recompressor. The turboexpander 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 turboexpander recompressor for transfer to residue compression, which consists of two parallel 15,000 horsepower compressors. These compressors increase residue gas pressure for delivery to pipeline.

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 Williams/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 Williams/MAPCO pipeline. The bottoms from the deethanizer contain mainly propane, butane, and condensate (PBC). This stream is transported via pipeline to the Conoco Wingate Plant.

The amine unit recovers  $\text{CO}_2$  from the EPBC product stream. Although inlet and residue gas  $\text{H}_2\text{S}$  concentrations meet pipeline quality standards, trace amounts of  $\text{H}_2\text{S}$  remain in the EPBC stream and are subsequently removed with the  $\text{CO}_2$  from the product stream. The amine unit vent gas is sent through the Thermal Oxidizer and heated to  $1200^{\circ}\text{F}$  for destruction of the  $\text{H}_2\text{S}$ . Appendix B is a process flow diagram of the plant operations.

## II. Operator/Legally Responsible Party & Local Representative

Conoco Inc. operates the San Juan Basin Gas Plant.

- a. Natural Gas & Gas Products Environmental Contact  
**Joyce Miley** - Director, Environmental  
Conoco Inc., Natural Gas and Gas Products Department  
P.O. Box 2197 - Humber 3036  
Houston, TX 77252-2197  
(281) 293-4498
- b. Site Contact  
**Lane Ayers** - Operations Manager  
P.O. Box 217  
Bloomfield, NM 87413  
(505) 632-4906

## 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 U.S. Department of the Interior Geological Survey/Topographical Map and a facility plot plan are included in Appendices C and D, respectively.

## IV. Landowners

El Paso Natural Gas  
P.O. Box 4990  
Farmington, New Mexico, 87499

## V. Facility Description

Appendix D is the facility plot plan. It shows the facility boundaries, the location of fences, pits, dikes/berms, and tanks. The plot plan 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	ADDITIVES
1. Separators, scrubbers, and slug catchers	Separator water, stormwater, 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, co-generation 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 or 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 sludges from tanks, ponds (sludge from the bottom of the evaporation ponds)	60 cu. yd. /yr.	N/A
10. Painting wastes	N/A	N/A
11. Sewage	N/A	N/A
12. Laboratory wastes	5 lbs.	Methanol, amine, other
13. Other wastes liquids	N/A	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, lab wastes and some filters. 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.

### 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). Equipment waste oil (equipment lube oil) is handled in the waste lube oil drain vessel (V-1401) and pumped to the waste lube oil tank (TK-1402A).

Tanks are surrounded by earthen dikes, 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 primary catch water basin is constructed along the Southwest property line to prevent any oil/water escape from the facility. A secondary catch water basin/dryout pit is located just Northeast of the primary basin.

In the unlikely event of a significant amount of oil 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 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, which is 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. Specific gravity-sensitive switches will alarm of that oil contamination and alert the 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 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 waste oil system. To install the tanks below grade, an outside contractor was hired to drill through the rock that is present at each location. Each site was packed with fresh dirt prior to installing the tanks. No groundwater was encountered during the installation procedure.

The waste oil (equipment lube oil) from V-1401 is collected and stored in TK-1402A on site. Safety Kleen recycles the waste oil. They periodically pick up the waste oil 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.

### **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" wastewater 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. Aboveground 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. 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. The cooling tower blow-down is directed to these ponds. Appendix I provides details on the construction and use of the ponds.
- (2) There are no on-site leach fields.
- (3) There are no on-site injection wells.
- (4) There is one additional catch-water basin/dryout pit located by the flare stack for drying out the evaporation pond and cooling tower basin sediment. When this maintenance occurs, the pit is temporarily lined.
- (5) There is no on-site solids disposal.
- (6) 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 wash-water 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 at the following locations:

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

Tierra Environmental Company Inc. (landfarm)  
420 Cr. 3100  
Aztec, NM 87410

**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 wash-water 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 wash-water. These areas drain to TK-1403. A primary catch water basin was constructed inside the fence at the South edge of the property. An additional catchwater basin/dryout pit was constructed for additional containment. The catchwater basin contains all other stormwater, preventing any runoff to surrounding areas. A field road just outside the fence on El Paso Natural Gas 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.

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

**C. Flood Protection**

Site work, including grading changes, was conducted prior to commencement of construction. A contour map is included in Appendix L. 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 Conoco were to cease operation and close the Plant, Conoco 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 appropriate District Office

**XV. Certification**

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

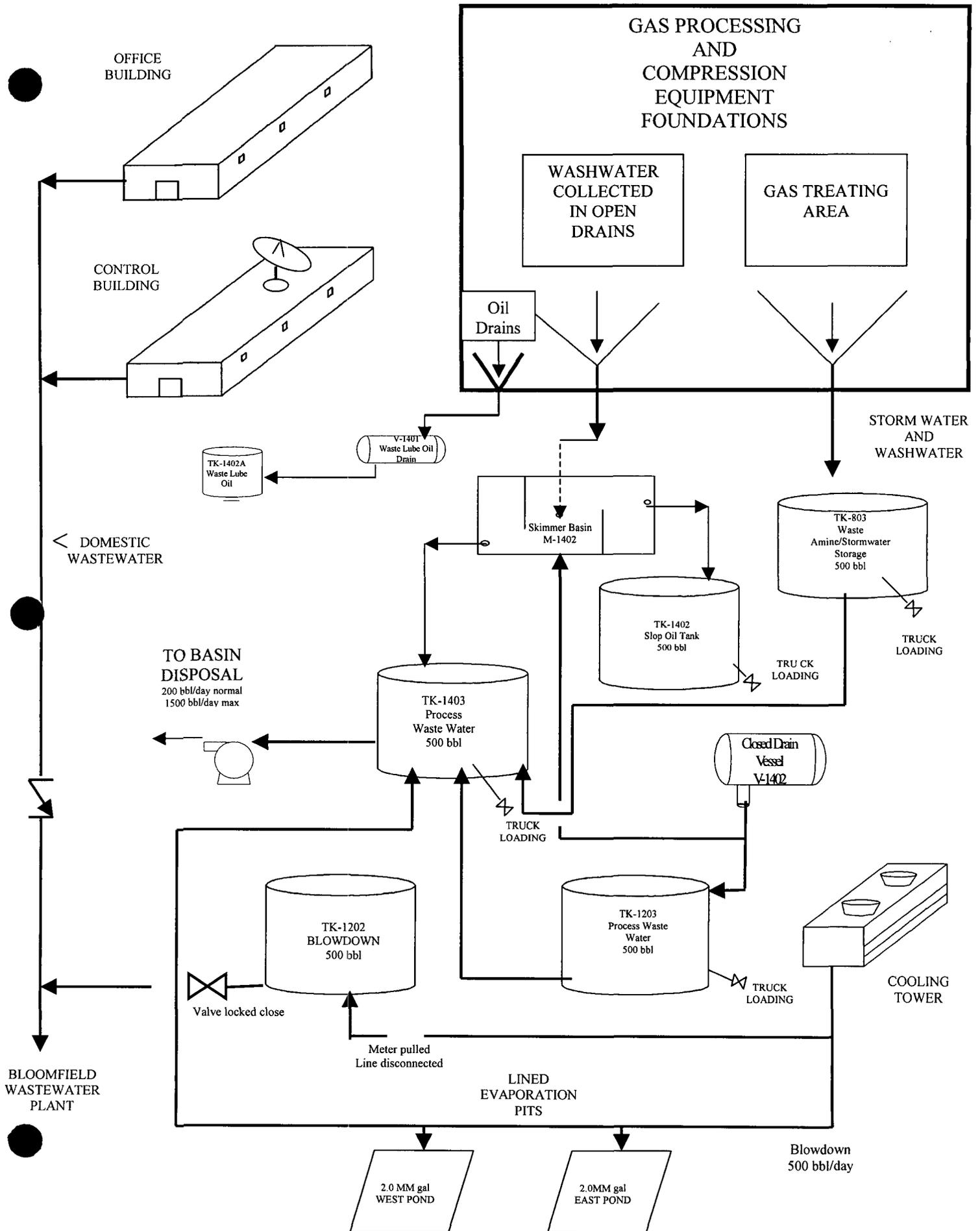
G. Lane Ayers

 6-22-01

Operations Manager  
San Juan Basin Gas Plant  
Natural Gas & Gas Products Department

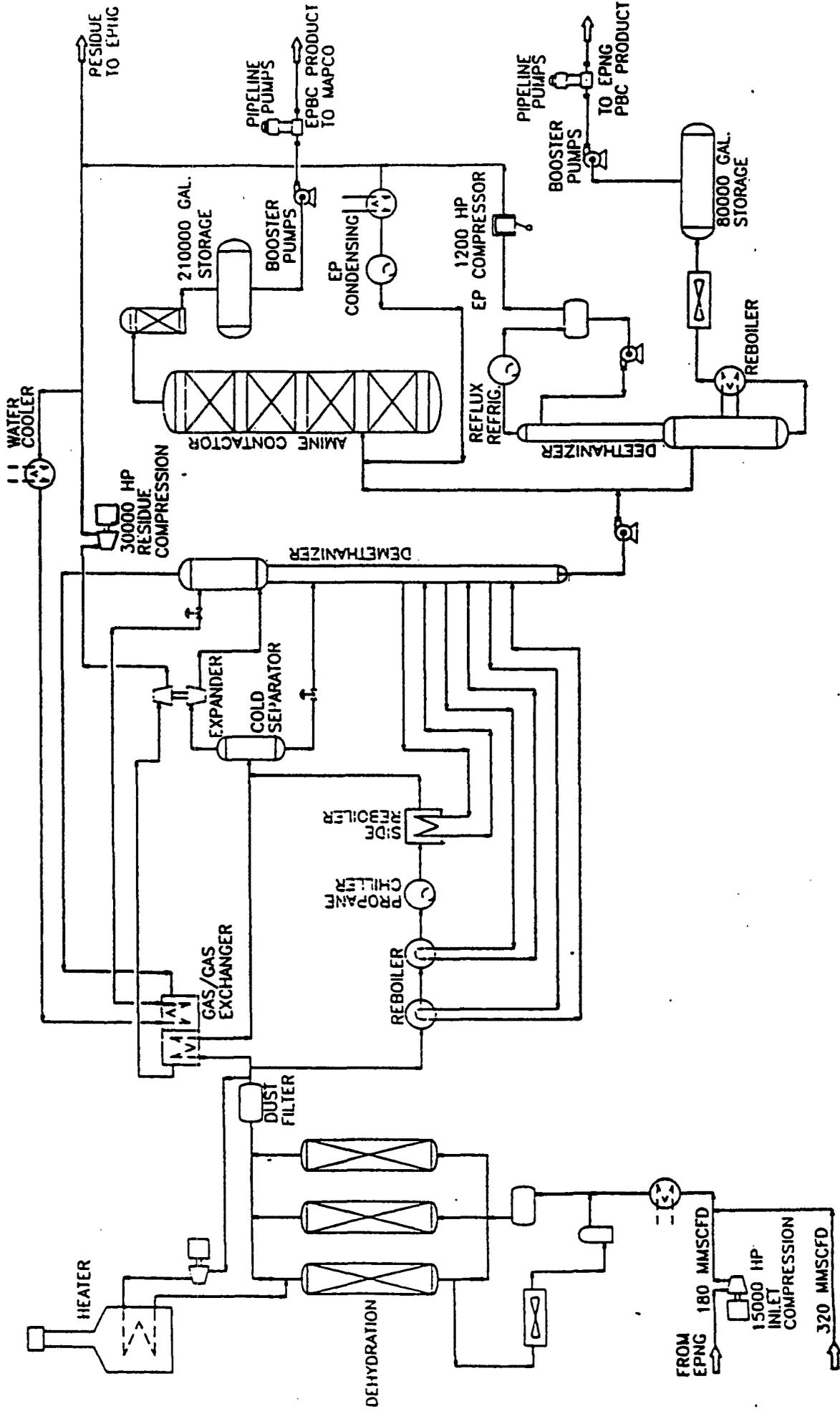
**Appendix A**  
**Wastewater Collection System**  
**Schematic Diagram**

SCHEMATIC DIAGRAM WASTEWATER DRAINAGE SYSTEM  
CONOCO INC., SAN JUAN BASIN PLANT



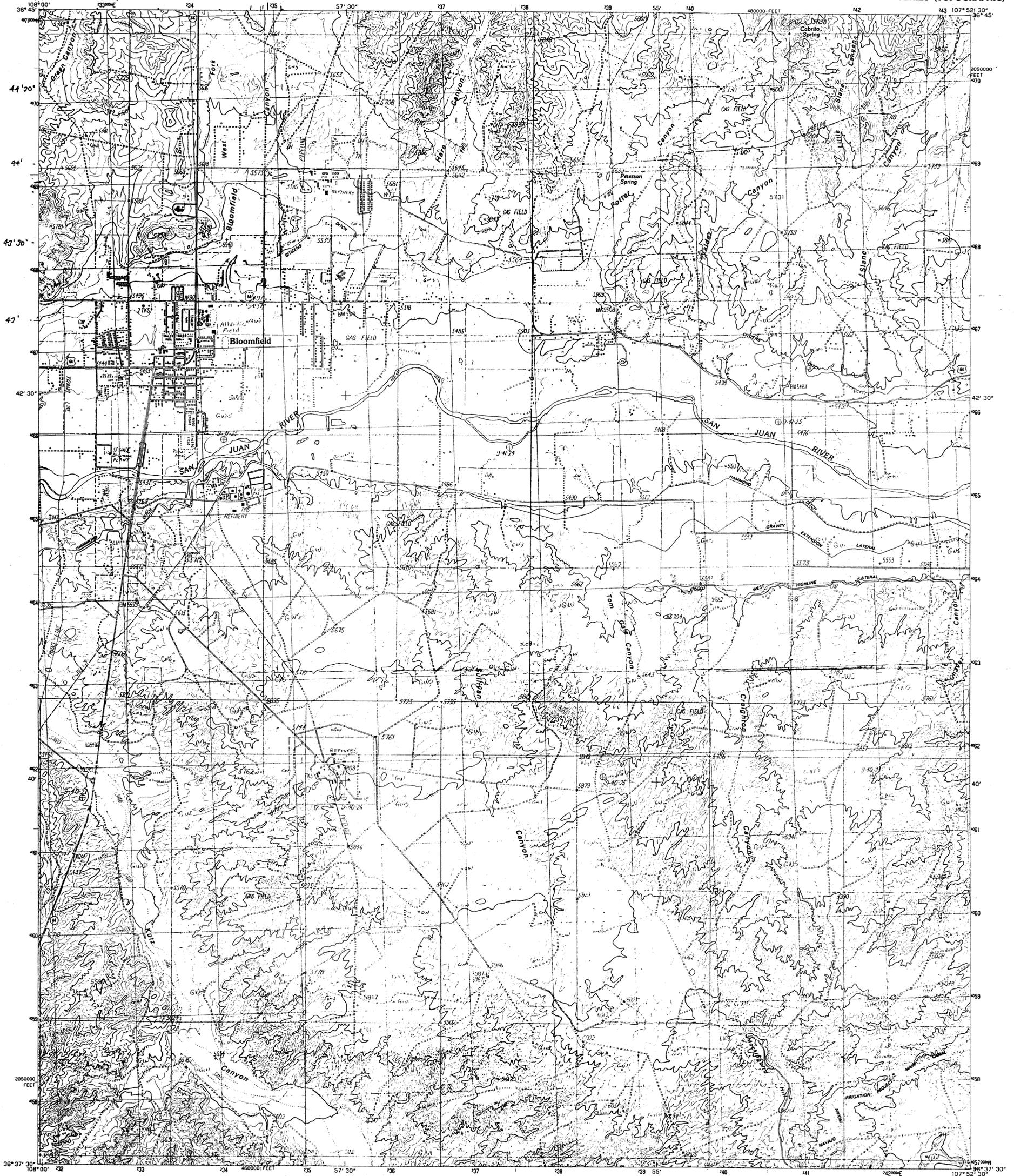
**Appendix B**  
**Process Flow Diagram**

# SAN JUAN GAS PLANT - PROCESS FLOW DIAGRAM



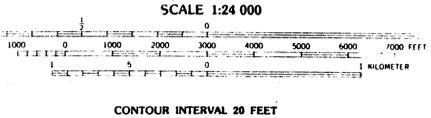
**Appendix C**

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



PRODUCED BY THE UNITED STATES GEOLOGICAL SURVEY  
CONTROL BY USGS, NOS/NOAA  
COMPILED FROM AERIAL PHOTOGRAPHS TAKEN 1977  
FIELD CHECKED 1981 MAP EDITED 1986  
PROJECTION TRANSVERSE MERCATOR  
GRID: 1000-METER UNIVERSAL TRANSVERSE MERCATOR ZONE 13  
6300-FOOT STATE GRID TICS NEW MEXICO, WEST ZONE  
UTM GRID DECLINATION 1°45' WEST  
1983 MAGNETIC NORTH DECLINATION 15° EAST  
VERTICAL DATUM NATIONAL GEODETIC VERTICAL DATUM OF 1929  
HORIZONTAL DATUM 1927 NORTH AMERICAN DATUM  
To place on the predicted North American Datum of 1983, move  
the projection lines as shown by dashed corner ticks  
(2 meters north and 56 meters east)  
There may be private inholdings within the boundaries of any  
Federal and State Reservations shown on this map

**PROVISIONAL MAP**  
Produced from original  
manuscript drawings. Information  
shown as of date of  
field check.



SOLD BY  
GAYLORD STICKLE CO. & ASSOC., INC.  
Authorized Agents For U.S. Geological Survey Maps  
Houston, Texas  
522-5771  
QUADRANGLE LOCATION

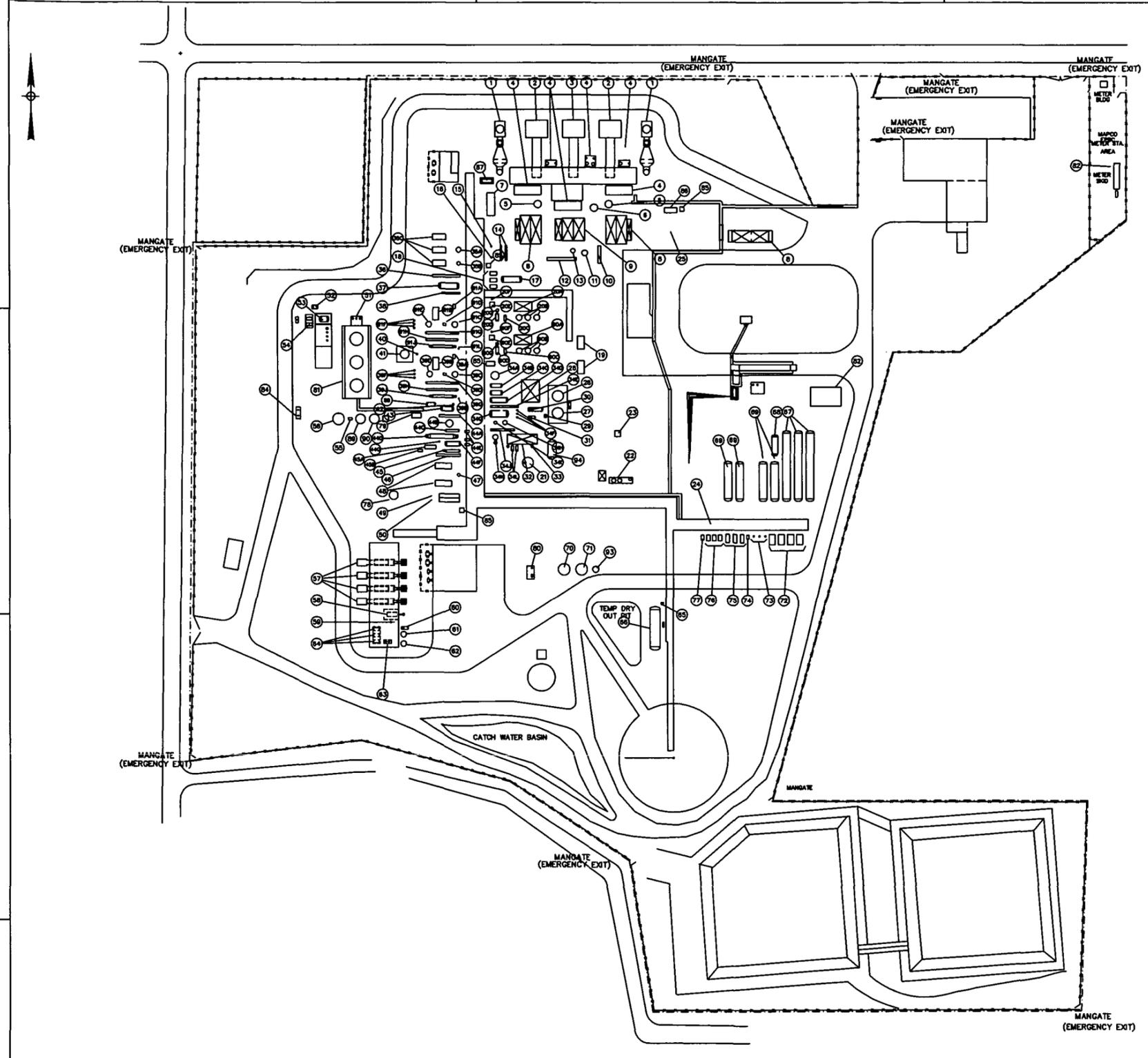
1	2	3	Flora Vista
4	5	6	Las Alamos
7	8	9	Harts Canyon
		10	Blanco
		11	Callison Trading Post
		12	East Fork San Juan Canyon
		13	Hartford Peak

**ROAD LEGEND**  
Improved Road .....  
Unimproved Road .....  
Trail .....  
Interstate Route ..... U.S. Route ..... State Route .....

**BLOOMFIELD, NEW MEXICO**  
PROVISIONAL EDITION 1985

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

**Appendix D**  
**Facility Plot Plan**



ITEM	EQUIPMENT DESCRIPTION	EQUIPMENT #	ITEM	EQUIPMENT DESCRIPTION	EQUIPMENT #
1	HOT OIL HEATERS (2)	WH-101 A,B	50	EP COMPRESSOR AFTERCOOLER	AC-902
2	RESIDUE COMPRESSORS (2)	C-201/301	51	COOLING WATER CIRCULATING PUMPS (3)	P-1201 A,B,C
3	INLET COMPRESSOR	C-101	52	CHLORINE FOR WATER TREATING	M-1202
4	LUBRICATING OIL SIDS (8)		53	ACID STORAGE TANK	V-1201
5	RESIDUE COMPRESSOR SUCTION SCRUBBERS (2)	V-201/301	54	WATER TREATMENT CHEMICAL TANKS (2)	M-1201
6	LOW PRESSURE INLET GAS SEPARATOR	V-101	55	DEMNERIALIZED WATER PUMP	P-1407
7	HOT OIL TRIM COOLER	AC-1101	56	DEMNERIALIZED WATER STORAGE TANK (3)	TK-802
8	RESIDUE COMPRESSOR AFTERCOOLERS (3)	AC-100-201-301	57	POWER GENERATORS (4)	C-1300 A,B,C,D
9	INLET COMPRESSOR AFTERCOOLER	AC-101	58	EMERGENCY GENERATOR	C-1301
10	HIGH PRESSURE INLET COOLER	E-101			
11	HIGH PRESSURE INLET GAS SEPARATOR	V-101	60	WASTE LUBE OIL DRAIN TANK & PUMP	V-1401/P-1402
12	INLET COMPRESSOR TRIM COOLER	E-102	61	INSTRUMENT AIR RECEIVER	V-1406
13	INLET COMPRESSOR DISCHARGE SCRUBBER	V-103	62	UTILITY AIR RECEIVER	V-1407
14	RECYCLE COOLERS (2)	E-201/301	63	INSTRUMENT AIR DRIER	M-1409
15	HIGH PRESSURE FUEL GAS SCRUBBER	V-1404	64	INSTRUMENT/UTILITY AIR COMPRESSOR (3)	M-1401 A,B,C
16	LOW PRESSURE FUEL GAS SCRUBBER	V-1405	65	FLARE KNOCKOUT DRUM PUMP	P-1406
17	HOT OIL EXPANSION VESSEL	V-1101	66	FLARE KNOCKOUT DRUM	V-1406
18	HOT OIL PUMPS (3)	P-1101 ABC	67	EPBC PRODUCT SURGE TANKS (2)	V-902 B,C
19	REGEN GAS HEATERS (2)	H-401/501	68	PROPANE STORAGE TANK	V-1007
20A	INLET GAS DEHYD. - COOLERS	AC-501 (TRAIN #1 OF 2)	69	PBC PRODUCT SURGE TANKS (4)	V-903 A,B,C,D
20B	INLET GAS DEHYD. - DEHYDRATORS (3)	V-501 A,B,C (TRAIN #1 OF 2)	70	WASTEWATER STORAGE TANK	TK-1403
20C	INLET GAS DEHYD. - DUST FILTER	F-502 (TRAIN #1 OF 2)	71	SLOP OIL STORAGE TANK	TK-1402
20D	INLET GAS DEHYD. - FILTER SEPARATOR	F-501 (TRAIN #1 OF 2)	72	EPBC PRODUCT PIPELINE PUMPS (4)	P-903 A,B,C,D
20E	INLET GAS DEHYD.-REGEN COMPR. & OIL COOLER	C-501 (TRAIN #1 OF 2)	73	EPBC PRODUCT BOOSTER PUMPS (3)	P-902 A,B,C
20F	INLET GAS DEHYD. - REGEN SCRUBBER	V-502 (TRAIN #1 OF 2)	74	PROPANE MAKEUP PUMP	P-1001
20G	INLET GAS COALESCE	F-501B (TRAIN #1 OF 2)	75	PBC PRODUCT PIPELINE PUMPS (3)	P-905 A,B,C
21	SULFA CHECK SYSTEM	TK-804	76	PBC PRODUCT BOOSTER PUMPS (3)	P-904 A,B,C
22	EPBC PRODUCT DEHY. S/D	F-903/V-905 A,B/V-907	77	PROPANE LOADING PUMP	P-908
23	EPBC PRODUCT DEHY REGEN HEATER	H-901	78	GENERATOR LUBE OIL TANK	TK-1300
24	FLANGED PIPING WITH HVL		79	VAPOR RECOVERY COMPRESSOR	C-1410
25	FLANGED PIPING WITH LIGHTER THAN AIR GASES		80	SKIM PIT	M-1402
26	WASTEWATER AND AMINE STORAGE TANK	TK-802	81	COOLING TOWER	CT-1201
27	AMINE STORAGE TANK	TK-801	82	PRODUCT METERING AREA & MAPCO MTR. AREA	
28	AMINE COOLER	AC-801	83	TRUCK LOADING CONNECTIONS (HVL)	
29	AMINE MAKEUP PUMP	P-803	84	TRUCK LOADING CONNECTIONS (FLAMMABLE LIQ.)	
30	AMINE SUMP PUMPS (2)	P-805 A,B	85	GAS ANALYZER BUILDING (4)	
31	AMINE DRAIN TANK PUMP	P-804	86	METER TRANSDUCER BUILDING	
32	AMINE STILL CONDENSER	AC-802	87	TURBINE LUBE OIL TANK	TK-101
33	AMINE STILL REFLUX ACCUMULATOR	V-805	88	COLD DRAIN VESSEL	V-1403
34A	AMINE TREATING - CONTACTOR	T-801	89	PROPANE STORAGE TANK	V-902 A
34B	AMINE TREATING - HYDROCARBON COALESCE	V-801	90A	INLET GAS DEHYD. - COOLERS	AC-401 (TRAIN #2 OF 2)
34C	AMINE TREATING - AMINE COALESCE	V-803	90B	INLET GAS DEHYD. - DEHYDRATORS (3)	V-401 A,B,C (TRAIN #2 OF 2)
34D	AMINE TREATING - FLASH VESSEL	V-802	90C	INLET GAS DEHYD. - DUST FILTER	F-402 (TRAIN #2 OF 2)
34E	AMINE TREATING - COOL AMINE EXCHANGER	E-801	90D	INLET GAS DEHYD. - FILTER SEPARATOR	F-401 (TRAIN #2 OF 2)
34F	AMINE TREATING - CIRCULATION PUMPS (3)	P-801 A, B, C	90E	INLET GAS DEHYD. - OIL COOLER	C-401 (TRAIN #2 OF 2)
34G	AMINE TREATING - SURGE VESSEL	V-804	90F	INLET GAS DEHYD. - REGEN SCRUBBER	V-402 (TRAIN #2 OF 2)
34H	AMINE TREATING - CHARCOAL FILTER	F-802	90G	INLET GAS COALESCE	F-401B (TRAIN #2 OF 2)
34I	AMINE TREATING - SOOK FILTER	F-801	91A	CRYO. TRAIN-GAS/GAS & COLD GAS/GAS EXCH.	E-701, E-702 (TRAIN #2 OF 2)
34J	AMINE TREATING - HOT AMINE EXCHANGER	E-802	91B	CRYO. TRAIN - EXPANDER/COMPRESSOR	X-701 (TRAIN #2 OF 2)
34K	AMINE TREATING - STILL PLUS REBOILER	T-802 & E-803	91C	CRYO. TRAIN - DEMETHANIZER + COLD VENT	T-701 (TRAIN #2 OF 2)
34L	AMINE TREATING - STILL REFLUX PUMPS (2)	P-802 A, B	91D	CRYO. TRAIN - DEMETH. UPPER SIDE REBOILER	E-705 (TRAIN #2 OF 2)
35A	REFRIGERANT COMPR. - LOW STAGE SUCT. SCRUB.	V-1002	91E	CRYO. TRAIN - COLD SEPARATOR	V-701 (TRAIN #2 OF 2)
35B	REFRIGERANT COMPR. - ECONOMIZER	V-1004	91F	CRYO. TRAIN - DEMETH. BOTTOMS PUMPS (3)	P-701 A, B, C (TRAIN #2 OF 2)
35C	REFRIGERANT COMPR. - COMPRESSORS (3)	C-1001 A, B, C	91G	CRYO. TRAIN - DEMETH. & TRIM REBOILERS	E-703, E-706 (TRAIN #2 OF 2)
36	REFRIGERANT CONDENSER	E-1001	91H	CRYO. TRAIN - LOWER SIDE REBOILER	E-707 (TRAIN #2 OF 2)
37	REFRIGERANT ACCUMULATOR	V-1001	91I	CRYO. TRAIN - LOW STAGE REFRIG. RECLAIMER	V-1008 (TRAIN #2 OF 2)
38	REFRIGERANT SUBCOOLER	E-1002	91J	CRYO. TRAIN - GAS CHILLER	E-704 (TRAIN #2 OF 2)
39A	CRYO. TRAIN - GAS/GAS & COLD GAS/GAS EXCH.	E-601, E-602 (TRAIN 1 OF 2)	92	STENCH VESSEL (ETHYL MERCAPTAN)	
39B	CRYO. TRAIN - EXPANDER/COMPRESSOR	X-601 (TRAIN 1 OF 2)	93	WASTE LUBE OIL TANK	TK-1402A
39C	CRYO. TRAIN - DEMETHANIZER + COLD VENT	T-601 (TRAIN 1 OF 2)	94	AMINE STILL REFLUX ACCUMULATOR	V-806
39D	CRYO. TRAIN - DEMETH. UPPER SIDE REBOILER	E-605 (TRAIN 1 OF 2)			
39E	CRYO. TRAIN - COLD SEPARATOR	V-601 (TRAIN 1 OF 2)			
39F	CRYO. TRAIN - DEMETH. BOTTOMS PUMPS (3)	P-601 A, B, C (TRAIN 1 OF 2)			
39G	CRYO. TRAIN - DEMETH. & TRIM REBOILERS	E-603, E-606 (TRAIN 1 OF 2)			
39H	CRYO. TRAIN - LOWER SIDE REBOILER	E-607 (TRAIN 1 OF 2)			
39I	CRYO. TRAIN - LOW STAGE REFRIG. RECLAIMER	V-1008 (TRAIN 1 OF 2)			
39J	CRYO. TRAIN - GAS CHILLER	E-604 (TRAIN 1 OF 2)			
40	METHANOL INJECTION PUMP	P-1101			
41	METHANOL STORAGE TANK	TK-1401			
42	CLOSED DRAIN PUMP	P-1403			
43	CLOSED DRAIN VESSEL	V-1402			
44A	DEETHANIZER - REBOILER	E-904			
44B	DEETHANIZER	T-901			
44C	DEETHANIZER - SIDE REBOILER	E-905			
44D	DEETHANIZER - REFLUX CONDENSER	E-901			
44E	DEETHANIZER - REFLUX PUMPS (3)	P-901 A, B, C			
44F	DEETHANIZER - REFLUX ACCUMULATOR	V-901			
44G	DEETHANIZER - HIGH STAGE REFRIG. RECLAIMER	V-1008			
45	EP PRODUCT CHILLER	E-903			
45A	EP METER S/D				
45B	EP REDJECTION PUMP	P-970			
46	EP PRODUCT TRIM COOLER	E-902			
47	EP COMPRESSOR SUCTION SCRUBBER	V-904			
48	EP PRODUCT COMPRESSORS (2)	C-901 A,B			
49	PBC COOLER	AC-901			

REFERENCE DRAWINGS:													
NO.	DATE	REVISION	DRW.	DES.	CHK.	APP.	NO.	DATE	REVISION	DRW.	DES.	CHK.	APP.
G	06/13/01	DISCHARGE PLAN RENEWAL - AS BUILT	DLE		FPC	FPC	D	07/24/95	REVISED PER FIELD COMMENTS	JWU	LA		
F	06/26/98	REVISED PER FIELD MARKUPS	JWU	LA	LA	LA	B	3/95	REVISED AS BUILT	LRW	LRW	LA	LA
E	06DEC95	REVISED PER FIELD TRIP	MSR	MSR	LA	LA	A	17MAY91	ORIGINAL ISSUE	BKJ	V.WOOD		



SAN JUAN BASIN GAS PLANT  
EQUIPMENT DESCRIPTION  
PLOT PLAN

SCALE: 1"=80'	PLOT SCALE: 1=960
AFE:	LOCATION: BLOOMFIELD, NM.
DWG. NO: NG&GP-SJ-29008	REV. G

NG&GP-SJ-29008  
 EQUIPMENT DESCRIPTION PLOT PLAN  
 DWG. NO. NG&GP-SJ-29008  
 08/04/98 14:26 JWU  
 SJS29008

**Appendix E**

**San Juan Plant Chemicals Stored and Used Inventory**

APPENDIX E

SAN JUAN BASIN GAS PLANT  
CHEMICAL STORED OR USED INVENTORY

Chemical	Mfr./MSDS by (other than Conoco)	Quantity (Lbs)		Quantity (Gal,Bbl,...)		Days on Site	Sigs. Code	Pres. Code	Temp. Code	*Container and Location
		Maximum	Average	Maximum	Average					
Activated Alumina	Alcoa		Not Stored							
Angry Orange Degreaser	American Sales			110 gal	< 110 gal	365	D	1	4	B-107
Asto 500	Royal Lubricants Co.			165 gal	55 gal	365	D	1	4	Oil Storage
A. T. Fluid Type F		800	600			365	D,R	1	4	Oil Storage
B&B 3100	B&B Chemical Co.	300	200			365	F	1	4	Shop
BFC (Halon 1211)	ICI U.S. Inc.		Not Stored							Gas Turbines & Generators
Benzene	DuPont		Not Stored (found in inlet gas only)							EPBC Driers
Betz Inhibitor 20K-41558	Betz	5,700	3,200	450 gal	250 gal	365	A	1	4	Cooling Towers
Betz Inhibitor 22K-41557	Betz	4,400	2,400	450 gal	250 gal	365	A	1	4	Cooling Towers
Butane/Gasoline Mix										Process & Storage
Butane/Isobutane		1,500,000	900,000			365	A	2	4,5,6,7	Process & Storage
Capella Oil WF68, 00562	Texaco	2,700	2,000			365	A,N	1,2	4,5	Oil Storage
Carbon Dioxide	General Electric	800,000	460,000			365	A	2	5,6,7	Process & Amine /TOS
Cecarbon Activated Carbon	Atochem	2,000	1,100			365	A,I,K	1,2	4,5	Oil Storage
Cer-wool Blanket HT, HP, etc.	C-E Refractories		Not Stored			365	K	1	4	Dehy Heaters

Chemical	Mfr./MSDS by (other than Conoco)	Quantity (Lbs)		Quantity (Gal,Bbl,...)		Days on Site	Stge. Code	Pres. Code	Temp. Code	*Container and Location
		Maximum	Average	Maximum	Average					
Cer-wool Moldable F	C-E Refractories		Not Stored			365	F	1	4	Drier Heater
Cerblanket (Alumino silicate)			Not stored							Dehy Heaters
Chlorine	Chlorine Institute	1,500	900			365	L	2	4	Cooling Tower
Coil Clean	Landa Inc.			1 gal	<1	365	N	1	4	I & E Shop
Condensate (Natural Gasoline)		1,000,000	750,000			365	A	2	4,5,6,7	Process & Storage Area
Dectol R. O. Oils		3,600	2,300			365	A,D	1	4,5	Oil Storage
Denstone® 57 (D-57) Balls, Pellets, Tower Packing	Norton Co.		Not stored							
Dexron III and Mercon		800	500			365	A,D	1,2	4	Oil Storage
Diesel, No. 2		33,900	18,300			365	A,B, C	1	4	Solar Turbine Area
Diethanolamine 85%	Coastal	200,000	100,000			365	A	1	4	TK-801
Ethane		3,000,000	2,000,000			365	A	2	4,5,6,7	Process & Storage Area
F-10 Biodegradable Soap	American Sales			75 gal	< 55 gal	365	A,D	1	4	B-107
Fleet HD Motor Oil		1,600	800			365	D	1	4,5	Oil Storage
Foam-trol CT	Betz	1,179	884	4 bbl	3 bbl	365	A	1	4	Cooling Tower
Foamglass Insulation	Pittsburgh Corning		Not Stored							Process Area & Analyzer Bldg
Gear Oils 68, 100, 150, .....		2,500	2,000			365	D	1,2	4	Oil Storage
Heat Transfer Oil		180,000	175,000			365	A	2	5	V-1101
Hydrogen Sulfide		2,000	1,500			365	R	1,2	4,5,6,7	TOS



Chemical	Mfr./MSDS by (other than Conoco)	Quantity (Lbs)		Quantity (Gal,Bbl,...)		Days on Site	Sigs. Code	Pres. Code	Temp. Code	*Container and Location
		Maximum	Average	Maximum	Average					
Trymer 190-2 Rigid Insulation			Not Stored							Process Area
Turbine Oils	NH	100,900	57,000			365	A	1	4,5	Oil Storage
UGL 80W-90	NH	50	25			365	F	1	4	Oil Storage
Unleaded Gasoline		650	300			365	R	1	4	Plant Trucks

EH = extremely hazardous

BT = below threshold for SARA III

NH = Not hazardous for SARA III

Chlorine (100 = Threshold Quantity)

Sulfuric Acid (500 = Threshold Quantity)

Hydrogen Sulfide (500 = Threshold Quantity)

**Appendix F**

**Waste Management Practices Chart**

Waste Management Practices

<u>Solid Waste</u>	<u>Process Generating Waste</u>	<u>Number of Units</u>	<u>Quantity per unit</u>	<u>Totals</u>	<u>Frequency of change "Months"</u>	<u>Annualized Waste Generated</u>	<u>Disposal</u>
Amine Sock Filters	Amine System	1	200	200	3	800	- Drain, dried, keep separate, & disposed at local landfill
Amine Charcoal Filters	Amine System	1	45	45	3	180	- Drain, dried, keep separate, & disposed at local landfill
D-R Lub Skid Filters	D-R Compressor Units	3	51	153	24	76.5	- Drain, dried, keep separate, & disposed at local landfill
Solar Lub Skid Filters	Solar Generator Units	4	5	20	12	20	- Drain, dried, keep separate, & disposed at local landfill
Refrigeration Compressor Lub Filters	Refrig. Compressor Units	3	1	3	12	3	- Drain, dried, keep separate, & disposed at local landfill
EP Compressor Lub Filters	EP Compressor Units	2	1	2	12	2	- Drain, dried, keep separate, & disposed at local landfill
Instrument Air Compressor Filters	Instrument Air Units	3	9	27	12	27	- Drain, dried, keep separate, & disposed at local landfill
Instrument Air Dehy Filters	Instrument Air Dehy System	1	10	10	6	20	- Disposed of at local landfill
Expander Lub Skid Filters	Expander Lub Skid	2	3	6	12	6	- Drain, dried, keep separate, & disposed at local landfill
Emergency Generator Filters	Emergency Generator	1	10	10	12	10	- Drain, dried, keep separate, & disposed at local landfill
Fire Water Pump Filters	Fire Water Pump	1	3	3	12	3	- Drain, dried, keep separate, & disposed at local landfill
Regen Compressor Lub Filters	Regen Compressors	2	1	2	24	1	- Drain, dried, keep separate, & disposed at local landfill
P-903 Pump Lub Filters	EPBC Pumps	4	1	4	6	8	- Drain, dried, keep separate, & disposed at local landfill
Inlet Gas Filters	Inlet Gas Dehy Units	2	28	56	6	112	- Drain, dried, keep separate, & disposed at local landfill
Inlet Gas Coalescing Filters	Inlet Gas Dehy Units	2	27	54	12	54	- Drain, dried, keep separate, & disposed at local landfill
Inlet Gas Dust Filters	Inlet Gas Dehy Units	2	55	110	6	220	- Drain, dried, keep separate, & disposed at local landfill
EPBC Coalescing Filters	EPBC Dyer Unit	1	25	25	3	100	- Drain, dried, keep separate, & disposed at local landfill
Avon Inlet Air Filters	D-R Compressor Units	3	224	672	24	336	- Drain, dried, keep separate, & disposed at local landfill
Solar Inlet Air Filters	Solar Generator Units	4	48	192	24	96	- Disposed of at local landfill
Total Annual Filters Waste: 2,075							
Molecular Sieve Type 4A	Inlet Gas Dehy Units	6	586	3516	36	1,172	- Disposed of at local landfill
Activated Alumina	EPBC Dyer Units	2	195	390	36	130	- Disposed of at local landfill
Activated Alumina	Instrument Air Dyer Unit	1	16	16	12	16	- Disposed of at local landfill
Oil Adsorbing Material	Clean-up around Plant	-	675	675	4	2,025	- Drain, dried, keep separate, & disposed at local landfill
Evaporation / Cooling Tower sediment	Cooling Tower	3	25	75	12	60	- Drain, dried, keep separate, & disposed at local landfill
Oily Rags	Plant maintenance activities	-	-	-	-	-	- Drain, dried, keep separate, & disposed at local landfill
Insulation Material	Plant maintenance activities	-	-	-	-	-	- Disposed of at local landfill
Aerosol Cans	Plant maintenance activities	-	-	-	-	-	- use up all paint & dispose of at local landfill
Paper Trash	Office Trash	-	-	-	-	-	- Disposed of at local landfill
Total Annual Filters Waste: 2,075							
<u>Liquid Waste</u>	<u>Process Generating This Waste</u>	<u>Storage Unit</u>	<u>Quantity per Day</u>	<u>Quantity per Month</u> <small>Gallons</small>	<u>Annualized Waste Generated</u>		
Produced Waste Waters	Inlet Scrubber Dumps	TK-1403 Ponds	7,900	240,950	2,891,400	gal	- Pumped/hauled to Disposal Well
C.T Blowdown water	Cooling Tower	TK-803	18,000	550,000	6,600,000	gal	- SJ Evaporation ponds or Disposal Well
Waste Amine	Waste Amine System	TK-1402	3,600	10,920	131,040	gal	- Pumped/hauled to Disposal Well
Slop Oil (process liquids)	Inlet Scrubber Dumps	-	25	760	9,120	gal	- Sale to Giant Refinery
Solvents	Parts cleaning Unit	-	-	40	480	gal	- Recycled
Paint & Activator	Plant maintenance activities	TK-1402A	-	250	3000		- Use up all paint, dry out cans, & dispose at local landfill
Waste oil (equipment tube oils)	Compressors/Turbines	Satellite Accumulation	-	5 lbs.	60 lbs.		- Recycled
Lab Waste	Laboratory	-	-	-	-		- As needed upon OCD approval

**Appendix G**  
**Underground Vessels**

## Appendix G

### UNDERGROUND VESSELS

Vessel Number	V-806	V-807	V-1401
Vessel Name	Amine Drain	Amine Waste Sump	Waste Lube Oil Drain
Commodity Stored	30% Diethanolamine <sup>(1)</sup>	Storm water <sup>(2)</sup>	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 <sup>(3)</sup>	0.25"	0.25"	0.25"
External Protection	Epoxy Coating	Epoxy Coating	Epoxy Coating
Design Pressure <sup>(4)</sup>	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

**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 Ponds Details**

## EFFLUENT DISPOSAL

### A. Existing Operations

#### 1. On-Site Disposal

Two ponds will be engineered and constructed according to the preliminary design in the attached drawing with 3:1 slopes on both sides of each levee, a maximum height of 10' and a total lined surface area of 115,500 sq. ft. (2.65 acres). The top of the levees will be 12' wide to provide a service road access to all four sides of each of the ponds. Transfer structures will be provided between the ponds with gate valves to control the level and flows between the ponds; a dispersion pipe array will disperse the drainage into the West Pond to absorb solar heat from liner slope and maximize evaporation.

The ponds will be sized as follows:

	West Pond	East Pond
Base Elevation	94'	102'
Levee Elevation	102'	110'
Area (berm to berm)	183'x 226' = 41,357 sq. ft.	234'x 230' = 54,510 sq. ft.
Area (@ 6' depth)	171'x 214' = 36,594 sq. ft.	225'x 218' = 49,050 sq. ft.
Volume (@ 6' depth)	1.35 million gallons	2.20 million gallons
Sprinkling system	15 - 2.5" nozzles	20 - 2.5" nozzles

Each pond will be equipped with a sprinkler system designed to enhance the yearly solar evaporation rate by 2 - 3 times with an anemometer monitor and several valve stations to limit and control overspray. An 8" PVC line from the cooling tower will feed a 6" PVC grid system with 3" PVC risers to nozzles fixed at 9' above the pond's bottom surface. The estimated flow rate is 50-60 gpm per sprinkler.

The primary liner in each pond will be 36 ml hypalon with a secondary 30 ml PVC liner. The liners will be vented according to NMOC guidelines. The leak detection bedding will be 8 oz. geotextile for each pond.

The drainage and sump leak detection system will consist of 4" perforated PVC piping with 20' maximum spacing and slope equal to 6" per 50'. A corrosion-proof sump will be located outside the pond.

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

*RM*

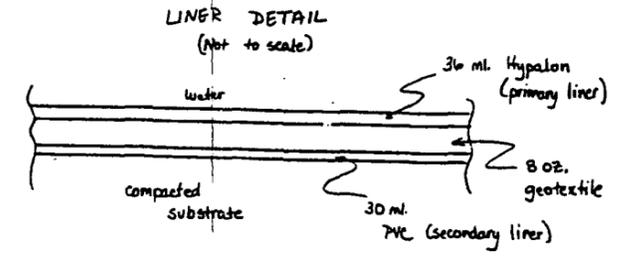
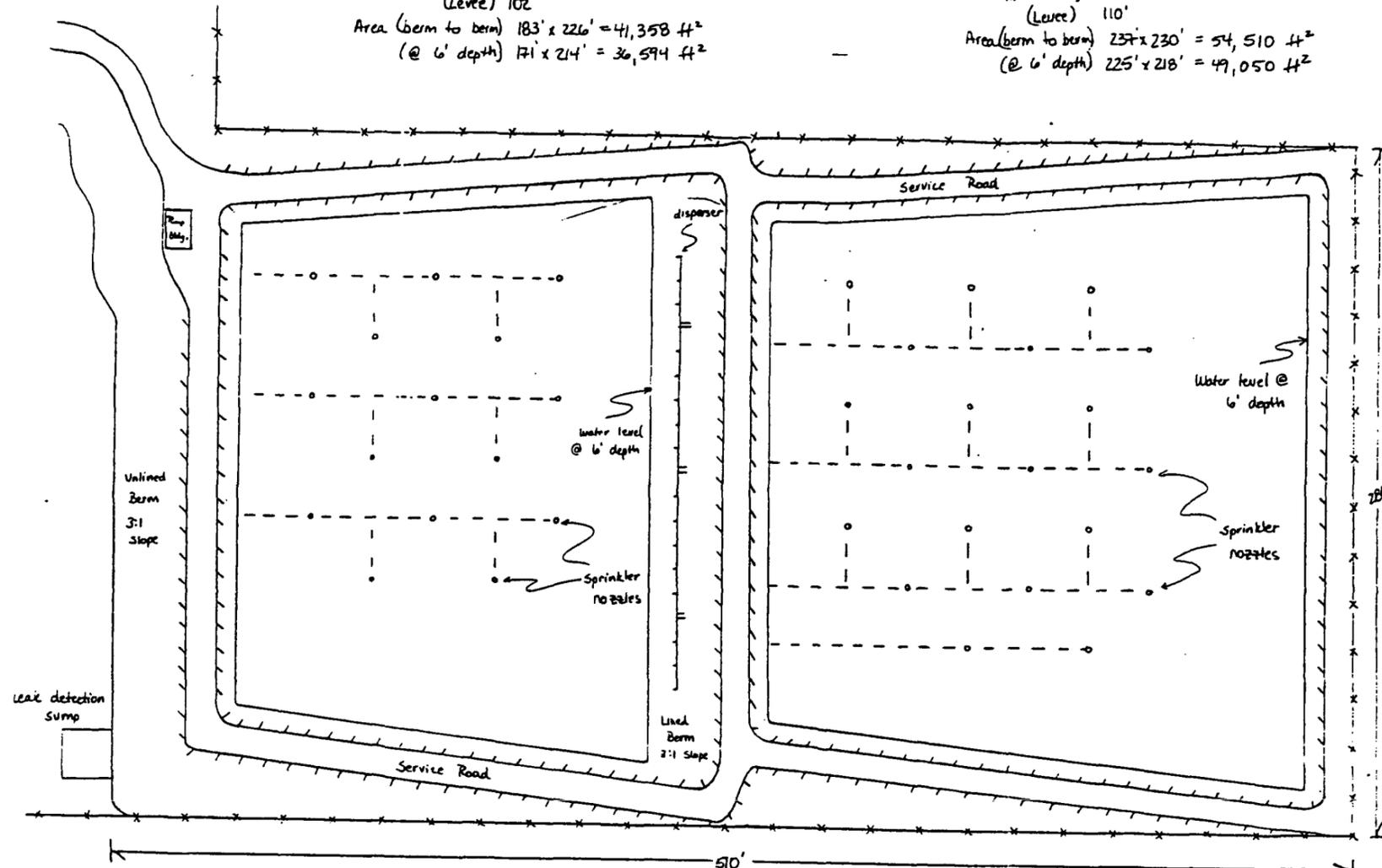
P.O. Box 2522  
Farmington, NM 87499  
505-327-5966

WEST POND

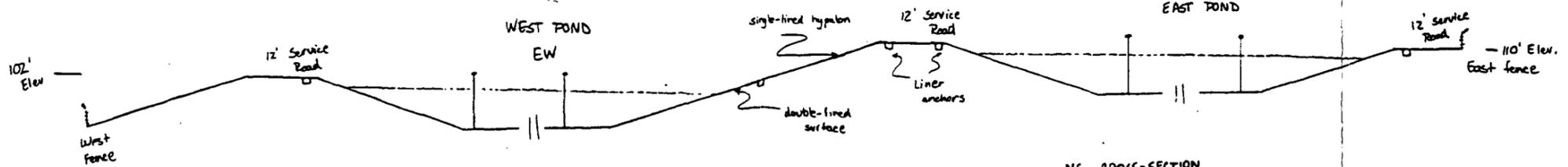
Elevation (Base) 94'  
    (Levee) 102'  
Area (berm to berm) 183' x 226' = 41,358 ft<sup>2</sup>  
    (@ 6' depth) 171' x 214' = 36,594 ft<sup>2</sup>

EAST POND

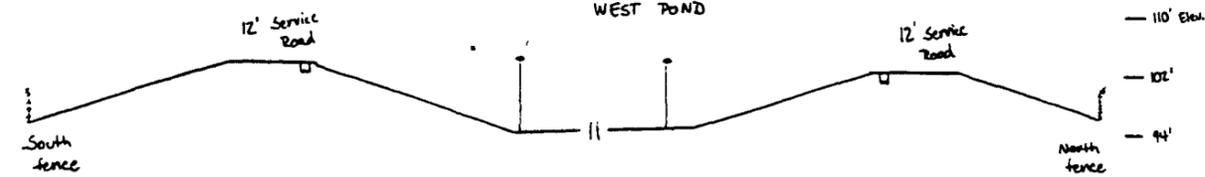
Elevation (Base) 102'  
    (Levee) 110'  
Area (berm to berm) 237' x 230' = 54,510 ft<sup>2</sup>  
    (@ 6' depth) 225' x 218' = 49,050 ft<sup>2</sup>



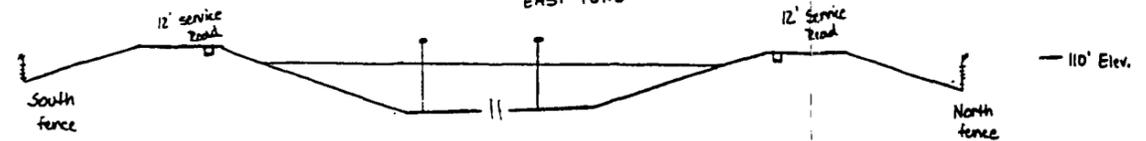
EW CROSS-SECTION Scale: 1" = 24'



NS CROSS-SECTION WEST POND



NS CROSS-SECTION EAST POND



11/02/72

**Appendix J**  
**SPCC Table of Contents**

**Appendix J**

**SPILL PREVENTION CONTROL AND COUNTER MEASURES PLAN  
SAN JUAN GAS PLANT  
TABLE OF CONTENTS**

EMERGENCY CONTACTS..... 2  
PART I: GENERAL INFORMATION & CERTIFICATION..... 4  
PART II: DESIGN & OPERATING INFORMATION..... 8  
PART III: CONTINGENCY PLAN..... 12  
PART IV: SPILL REPORTING PROCEDURES GUIDE.....15

**ATTACHMENTS:**

ATTACHMENT I SPILL HISTORY  
ATTACHMENT II COMMITMENT OF MANPOWER, EQUIPMENT, ETC.  
ATTACHMENT III BULK STORAGE TANK DRAINAGE SYSTEM INSPECTION FORM  
ATTACHMENT IV SPCC INSPECTION OUTLINE  
ATTACHMENT V CONTRACTOR AND EQUIPMENT LIST  
ATTACHMENT VI CERTIFICATION OF SUBSTANTIAL HARM DETERMINATION  
Memorandum to File: Three-Year Review and Implementation of SPCC Plan

**FIGURES:**

FIGURE 1. San Juan Gas Plant Surface Drainage Plan  
FIGURE 2. San Juan Gas Plant Area Map

**Appendix K**  
**Hydrologic Formations**



**GEOLOGIC UNITS**  
(see text for descriptions)

- Quaternary**
  - Qal Alluvium; includes landslide deposits (east side of Chuska Mountains), terrace deposits (San Juan River valley)
  - Qb Basalt
- Quaternary/Tertiary**
  - Qts Santa Fe Group and younger alluvium, undifferentiated (Rio Grande valley)
- Tertiary**
  - Ti Intrusions, dikes
  - Tb Basalt
  - Tv Volcanics other than basalt
  - Tc Chuska Sandstone
  - Tsj San Jose Formation
  - Tn Naclimento Formation
  - Toa Ojo Alamo Sandstone
- Tertiary/Cretaceous**
  - Tka Animas Formation
- Cretaceous**
  - Kkf Fruitland Formation-Kirtland Shale, undifferentiated
  - Kpc Pictured Cliffs Sandstone
  - Kl Lewis Shale
  - Kmv Mesaverde Group, undifferentiated
  - \*Kch Cliff House Sandstone
  - \*Klv La Ventana Tongue, Cliff House Sandstone
  - \*Kmf Menefee Formation
  - \*Kpl Point Lookout Sandstone
  - Kms Salan Tongue, Mancos Shale
  - \*Kph Hosta Tongue, Point Lookout Sandstone
  - \*Kcc Crevasse Canyon Formation
  - Kmm Mulatto Tongue, Mancos Shale
  - \*Kg Gallup Sandstone
  - Km Mancos Shale, undifferentiated
  - Kd Dakota Sandstone; includes Burro Canyon Formation (northeast)
  - \*in Mesaverde Group
- Jurassic**
  - Jm Morrison Formation
  - Jsr San Rafael Group, undifferentiated; includes Entrada Sandstone, Todilto Limestone, Summerville Formation, Cow Springs Sandstone/Bluff Sandstone, in ascending order
- Triassic**
  - T Triassic rocks, undifferentiated; includes Chinle Formation and overlying Glen Canyon Group
- Paleozoic**
  - P Permian rocks, undifferentiated; includes Abo Formation (south), lower Cutler Formation (north), DeChelly Sandstone, Yeso Formation, Glorieta Sandstone, San Andres Limestone, in ascending order
  - P Pennsylvanian rocks, undifferentiated; includes Molas Formation, Pinkerton Trail Formation, Paradox Formation (northwest), Honaker Trail Formation, in ascending order
- Precambrian**
  - pC Precambrian rocks, undifferentiated

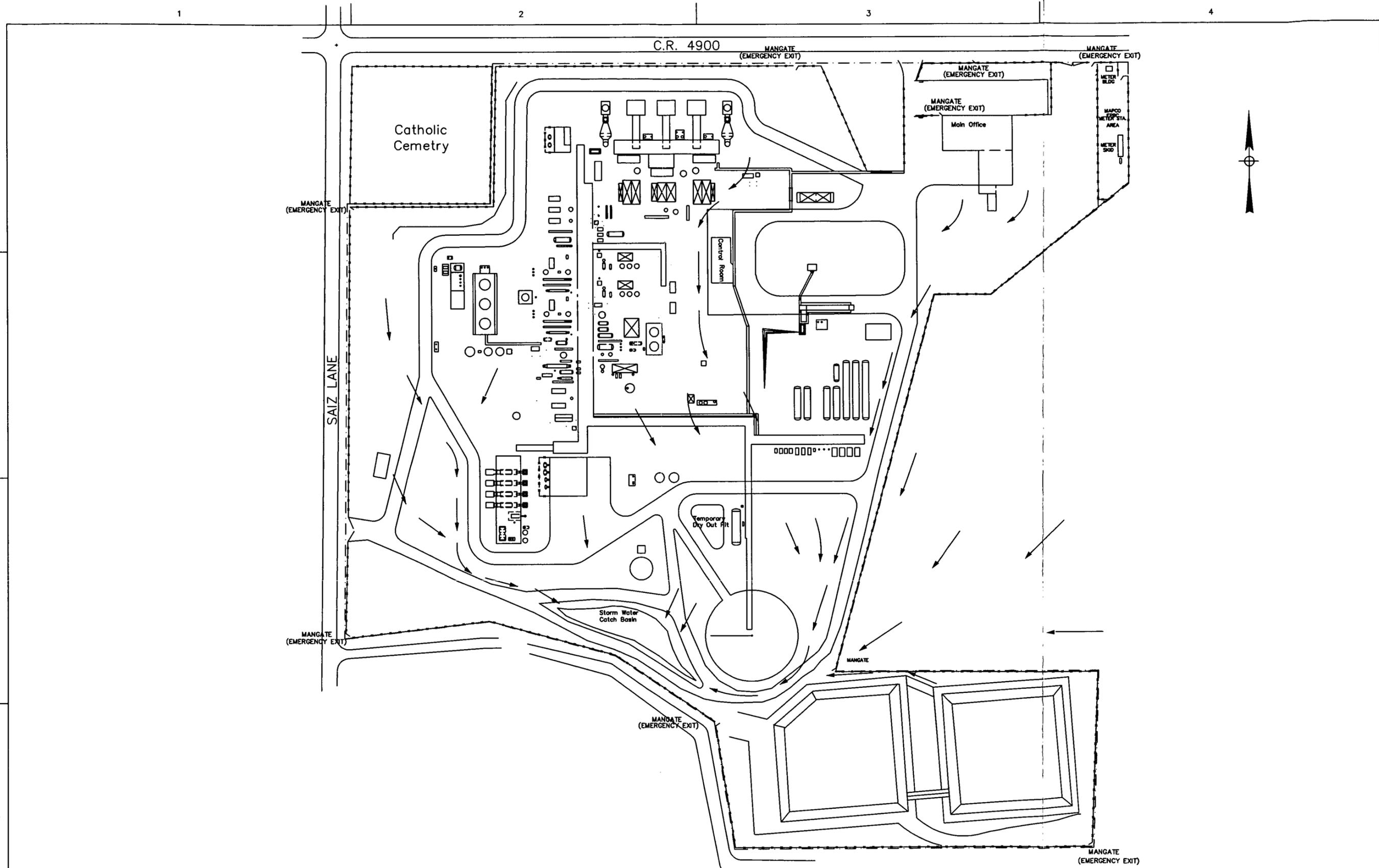
**WATER-YIELDING CHARACTERISTICS\***

- Aquifer
- Locally an aquifer or contains aquifer
- Aquitard
- Poorly known or outside study area

\*See table 14 (inside front cover) for summary of aquifer characteristics

Hydrogeologic map of the San Juan Basin, New Mexico

**Appendix L**  
**Site Contour Map**



REFERENCE DRAWINGS:

NO.	DATE	REVISION	DRW.	DES.	CHK.	APP.	NO.	DATE	REVISION	DRW.	DES.	CHK.	APP.
G	06/13/01	DISCHARGE PLAN RENEWAL - AS BUILT	DLE		FPC	FPC	D	06DEC95	REVISED BACKGROUND PER FIELD TRIP	MSR	MSR	LA	LA
F	08/1999	Revised as Built	TDR		GLA		B	15MAR95	REVISED PER FIELD COMMENTS	JWU	LA		
E	06/30/98	REVISED AS BUILT							REVISED AS BUILT	LRW	LRW	RLM	LA
		REVISED PER FIELD MARKUPS	JWU	LA	LA	LA	A	23SEP93	ISSUE FOR APPROVAL	JWU	VGW	VGW	

NO.	DATE	REVISION	DRW.	DES.	CHK.	APP.	NO.	DATE	REVISION	DRW.	DES.	CHK.	APP.
D	06DEC95	REVISED BACKGROUND PER FIELD TRIP					D	06DEC95	REVISED BACKGROUND PER FIELD TRIP	MSR	MSR	LA	LA
C	07/24/95	REVISED PER FIELD COMMENTS					C	07/24/95	REVISED PER FIELD COMMENTS	JWU	LA		
B	15MAR95	REVISED AS BUILT					B	15MAR95	REVISED AS BUILT	LRW	LRW	RLM	LA
A	23SEP93	ISSUE FOR APPROVAL					A	23SEP93	ISSUE FOR APPROVAL	JWU	VGW	VGW	



SAN JUAN BASIN GAS PLANT  
Figure 1  
SURFACE DRAINAGE PLAN

SCALE: 1"=100'	PLOT SCALE: 1"=100'
AFE:	LOCATION: BLOOMFIELD, NM
DWG. NO: NG&GP-SJ-29025	REV. G



Joyce Miley  
Director, Environmental  
Natural Gas & Gas Products

Conoco Inc.  
San Juan Gas Plant  
P.O. Box 217  
Bloomfield, NM 87413  
(505) 632-4900

~~Certified Mail 7099 3220 0010 2242 6898~~  
~~Return Receipt Requested~~

*N/A RBJ*

June 15, 2001

Mr. Roger Anderson, Chief Oil Conservation Division  
Energy and Minerals Department  
Oil Conservation Division  
1220 South St Francis Drive  
Santa Fe, NM 87505

**RE: Request for Discharge Plan Renewal  
San Juan Gas Plant  
Bloomfield, NM 87413**

Dear Mr. Anderson:

The Discharge Plan for the San Juan Gas Processing Plant was last renewed on May 15, 1996. The current plan approval expires on October 27, 2001.

In accordance with Section 3-109 of the New Mexico Water Quality Control Commission Regulations and the current approval, Conoco Inc. hereby requests the discharge plan approval be renewed. Enclosed are two copies of the updated plan and a check for \$4,100.00 for renewal.

If you have any questions or require additional information, please contact Joyce Miley at (281) 293-4498. Thank you for your assistance.

Sincerely,

*Joyce Miley*

Joyce Miley

**Attachments**

- 2 Copies - Addressee
- 1 Copy - OCD District III  
1000 Rio Brazo Road  
Aztec, NM 87410

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 South First, Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
10 S. St. Francis Dr., Santa Fe, NM 87505

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

Revised January 24, 2001

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

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

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

New       Renewal       Modification

1. Type: Gas Processing

2. Operator: Conoco Inc.

Address: P.O. Box 217 Bloomfield, NM 87413

Contact Person: Lane Ayers Phone: (505) 632-4906

3. Location: NW /4 NW /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: Operations Manager

Signature: Richard R. Sheander Date: 6-25-01  
For Lane Ayers



June 26, 2001

Conoco Inc.  
San Juan Gas Plant  
P.O. Box 217  
Bloomfield, NM 87413  
(505) 632-4900

Mr. Roger Anderson, Chief Oil Conservation Division  
Energy & Minerals Department  
Oil Conservation Division  
1220 South St. Francis Drive  
Santa Fe, NM 87505

**Re: Request for Discharge Plan Renewal  
San Juan Gas Plant, San Juan County, New Mexico**

Mr. Anderson or designee:

Our intent was for the following letter and required documents to be delivered via certified mail with the check included in that mailing as stated in the letter. We were not able to secure the check in time for that delivery. A check in the amount of \$4,000.00 for payment of the Discharge Plan renewal will be sent directly from our Ponca City office to your attention at your Santa Fe, New Mexico office. Included with delivery of the Discharge Plan and application today is a check for \$100.00 to cover the filing fee.

We would appreciate your consideration of also allowing us to use this letter to serve as documentation of delivery of the Discharge Plan for renewal and the check by acknowledging with a signature below.

We apologize for any inconvenience this may cause.

Best regards,

Richard R. Theander  
Maintenance Foreman  
(505) 632-4907  
[richard.r.theander@usa.conoco.com](mailto:richard.r.theander@usa.conoco.com)

Received by: James O. Rios

Date received: 6/24/01



Joyce Miley  
Director, Environmental  
Natural Gas & Gas Products

Conoco Inc.  
San Juan Gas Plant  
P.O. Box 217  
Bloomfield, NM 87413  
(505) 632-4900

~~Certified Mail 7099 3220 0010 2242 6898~~  
~~Return Receipt Requested~~

*NABBY*

June 15, 2001

Mr. Roger Anderson, Chief Oil Conservation Division  
Energy and Minerals Department  
Oil Conservation Division  
1220 South St Francis Drive  
Santa Fe, NM 87505

**RE: Request for Discharge Plan Renewal  
San Juan Gas Plant  
Bloomfield, NM 87413**

Dear Mr. Anderson:

The Discharge Plan for the San Juan Gas Processing Plant was last renewed on May 15, 1996. The current plan approval expires on October 27, 2001.

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If you have any questions or require additional information, please contact Joyce Miley at (281) 293-4498. Thank you for your assistance.

Sincerely,

*Joyce Miley*

Joyce Miley

Attachments

- 2 Copies - Addressee
- 1 Copy - OCD District III  
1000 Rio Brazo Road  
Aztec, NM 87410

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

Revised January 24, 2001

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

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

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

New       Renewal       Modification

1. Type: Gas Processing

2. Operator: Conoco Inc.

Address: P.O. Box 217 Bloomfield, NM 87413

Contact Person: Lane Ayers Phone: (505) 632-4906

3. Location: NW /4 NW /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: Operations Manager

Signature: Richard R. Sheander Date: 6-25-01  
For Lane Ayers



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

Memorandum of Meeting or Conversation

Telephone [X]
Personal
E-Mail [X]
FAX:

Date: 3/19/01

Originating Party: Wayne Price-OCD

Other Parties: Lane Ayers-Conoco Inc. 505-632-4900

Subject: Discharge Plan Renewal Notice for the following Facilities:

GW-035 Conoco San Juan GAS Plant expires 10/27/01
GW- Name expires
GW- Name expires
GW- Name expires

WQCC 3106.F. If the holder of an approved discharge plan submits an application for discharge plan renewal at least 120 days before the discharge plan expires, and the discharger is not in violation of the approved discharge plan on the date of its expiration, then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved. A discharge plan continued under this provision remains fully effective and enforceable. An application for discharge plan renewal must include and adequately address all of the information necessary for evaluation of a new discharge plan. Previously submitted materials may be included by reference provided they are current, readily available to the secretary and sufficiently identified to be retrieved. [12-1-95]

Discussion: Discussed WQCC 3106F and gave notice to submit Discharge Plan renewal application with \$100.00 filing fee for the above listed facilities.

Conclusions or Agreements:

Please send DP application and filing Fee before 6/27/01 to qualify WQCC 3106.F provision.

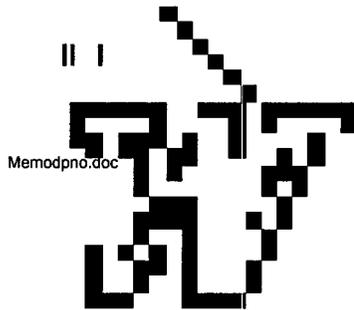
Handwritten signature of Wayne Price

Signed:

**Price, Wayne**

---

**From:** Price, Wayne  
**Sent:** Monday, March 19, 2001 2:19 PM  
**To:** 'g.lane.ayers@usa.conoco.com'  
**Subject:** San Juan Gas Plant DP renewal notice





Conoco Inc.  
San Juan Gas Plant  
P.O. Box 217  
Bloomfield, NM 87413  
(505) 632-4900

May 17, 2000

New Mexico Energy Minerals & Natural Resources Department  
Oil Conservation Division  
2040 South Pacheco Street  
Santa Fe, NM 87505  
Attn: Mr. Roger C. Anderson  
Environmental Bureau Chief

RE: Request for Discharge Plan GW-035 Modification  
San Juan Gas Plant

Dear Mr. Anderson:

Enclosed is our Check #1039, dated 5/16/00, in the amount of \$1,717.50, in payment of the WQCC Regulation 3114 discharge plan fee per your letter dated 5/3/00.

If there are any questions concerning this payment, please feel free to contact me at (505)632-4914.

Thank You,

A handwritten signature in cursive script that reads "Diane Wierenga".

Diane S. Wierenga  
Sr. Associate  
SAN JUAN GAS PLANT

/dsw  
Encl. (1)



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

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

May 3, 2000

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. 5051 5864**

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

Re: Request for Discharge Plan GW-035 Modification  
San Juan Gas Plant

Dear Mr. Ayers:

The New Mexico Oil Conservation Division (NMOCD) is in receipt of Conoco Inc.'s letter and discharge plan modification for the above captioned facility. **The plan is hereby approved** with the following conditions.

1. The wastewater pipeline shall be subject to condition 8. (Underground Process/Wastewater Lines:) of the existing permit requiring Conoco Inc. to demonstrate mechanical integrity of the line.
2. 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.

The discharge plan modification for the Conoco Inc. 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 \$50.00 and a flat fee for gas plant modifications to be one-half of the original discharge plan fee or \$1,667.50. Please submit the above required fees within 10 days of receipt of this document.

If you have any questions, please contact Wayne Price of my staff at (505-827-7155). 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

xc: OCD Aztec Office

GW-035



G. Lane Ayers  
Plant Manager  
San Juan Gas Plant  
Natural Gas and Gas Products

Conoco Inc.  
San Juan Gas Plant  
P.O. Box 217  
Bloomfield, NM 87413  
(505) 632-4900

March 27, 2000

RECEIVED  
MAR 31 2000  
Environmental Bureau  
Oil Conservation Division

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

RE: Request for Discharge Plan Modification

Dear Roger Anderson:

The purpose of this letter is to request a modification of the San Juan Gas Plant Discharge Plan in accordance with NEW MEXICO WATER QUALITY CONTROL COMMISSION Regulation 20NMAC6.2. 3109E and 3109F which address modifications to discharge plans. The attached items summarize the requested change:

SJGP Waste Water Pipeline Project Summary  
SJGP Waste Water Pipeline Drawing Package

If you have any questions or require additional information, please contact Dustin Ernst at (505) 632-4949. Thank you for your assistance.

Sincerely,

G. Lane Ayers  
Plant Manager  
San Juan Gas Plant  
Conoco Inc. - NGGP

G. LANE AYERS @ USA.20V020.COM

Attachments  
2 Copies - Addressee  
1 Copy - OCD District III  
1000 Rio Brazos Road  
Aztec, NM 87401

PROJECT  
SUMMARY

SJGP -WASTE WATER PIPELINE PROJECT  
PROJECT SUMMARY

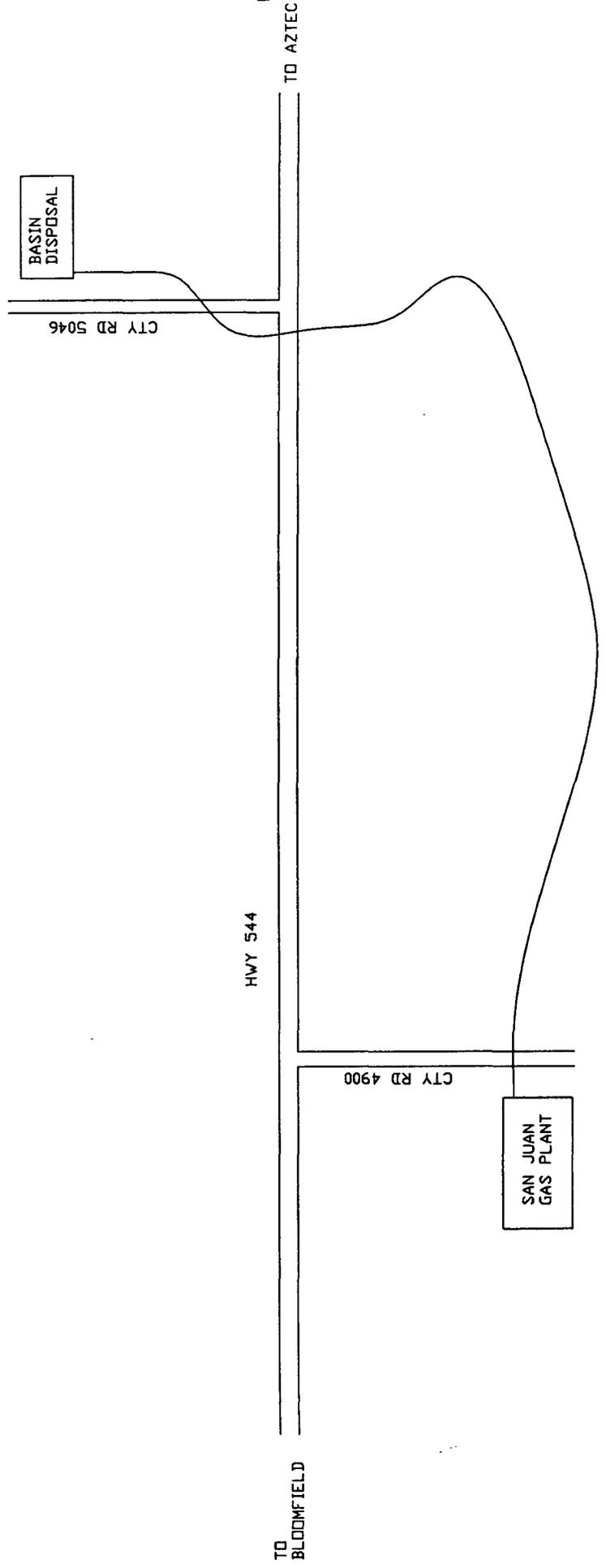
This project consists of the installation of 2.8 miles of polyethylene pipe from the San Juan Gas Plant to the site of Basin Disposal Inc. Basin Disposal operates a Class II Disposal well that the plant currently utilizes to dispose of effluent so that storage capacities are not exceeded. The inventories that will be continuously transported via the main pipeline are made up of the following: separator water, stormwater, and washwater. These three sources of waste water will continue to be drained into TK1403. An eight stage centrifugal pump will pump the fluid from TK1403 to Basin Disposal. There will be meters monitoring the amount of fluid that is transported at the San Juan Plant, and at Basin Disposal. The pipeline will also be utilized to facilitate evaporation pond maintenance. The system will be setup so that when the evaporation ponds require maintenance, the inventories in the ponds can be transported via pipeline to TK1403 and then transported down the main line to Basin Disposal. This operation will be completely separate of the continuous operation. The system that will allow the plant to transport the contents of the pond will be operated only when pond maintenance is required, or if the maximum pond capacity is being reached.

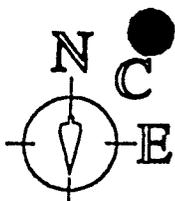
The pipeline will be constructed of 3" SDR 9 API15LE PE3408 polyethylene line pipe. The maximum operating pressure of the system is 200 psi, and the actual operating pressure will be approximately 150 psi. The line will be pressure tested in accordance with API15LE, ASTM 2774 and BLM requirements prior to startup. The pipeline will be constructed in accordance with API15LE, ASTM 2774, BLM specifications, and the manufacturer's recommendations.

Test samples of the effluents to be transported, a layout drawing of the system, and land survey are attached.

DUG'S, SURVEY,  
SCHEMATIC, TEST RESULTS

SAN JUAN GAS PLANT  
WASTE WATER PIPELINE  
GENERAL ARRANGEMENT DRAWING





**SURVEYS, INC.**

P.O. BOX 6612  
FARMINGTON, NM 87499  
OFFICE: (505)325-2654  
FAX: (505)326-5650

R.O.W. Easement Description  
for  
Conoco, Inc. Waste Disposal Line  
On State of New Mexico Lands  
In Section 2, T29N, R11W, NMPM,  
San Juan County, New Mexico

**WASTE DISPOSAL LINE**

That parcel of land as situated in the Southwest Quarter of the Southwest Quarter (SW/4 SW/4) of Section 2, Township 29 North, Range 11 West, San Juan County, New Mexico. Being more particularly described as being 15 feet on both sides of the following described centerline.

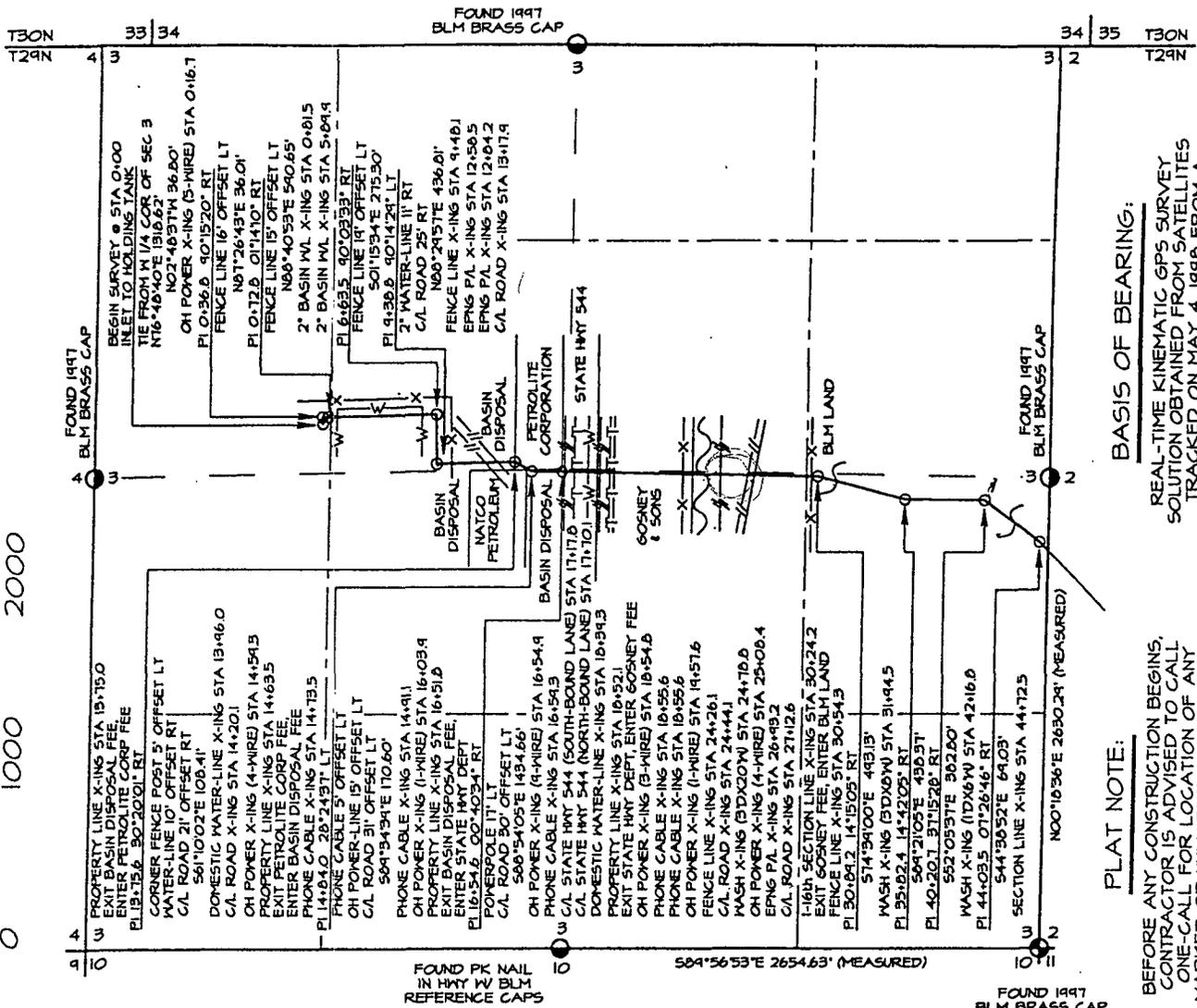
COMMENCING at the West 1/4 Corner of said Section 2, thence S 31° 53' 23" E a distance 1536.22 feet to the true "POINT OF BEGINNING" for this description

THENCE: S 26° 57' 50" W a distance of 1483.94 feet

to the "POINT OF ENDING" for this description, from whence the Southwest Corner of Said Section 2 bears S 88° 46' 27" W a distance of 152.97 feet, containing 1483.94 feet and 1.02 acres, more or less, as follows:

SWSW          1483.94 feet, 89.93 Rods, 1.02 Acres

**PROPOSED PIPELINE SURVEY FOR  
CONOCO, INC. WASTE DISPOSAL LINE  
SECTION 3, T29N, R11W, NMPM,  
SAN JUAN COUNTY, NEW MEXICO**



**BASIS OF BEARING:**

REAL-TIME KINEMATIC GPS SURVEY SOLUTION OBTAINED FROM SATELLITES TRACKED ON MAY 4, 1998 FROM A REFERENCE STATION POSITIONED IN THE SE/4 SW/4 OF SEC II, T29N, R11W

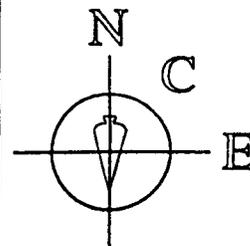
**PLAT NOTE:**

BEFORE ANY CONSTRUCTION BEGINS, CONTRACTOR IS ADVISED TO CALL, ONE-CALL FOR LOCATION OF ANY MARKED OR UNMARKED PIPELINES OR CABLES IN THE AREA OF THIS PROJECT.

OWNERSHIP		
FEE (BASIN DISPOSAL)	0+00 TO 13+75.0	1375.0 FT / 83.33 RODS
FEE (PETROLITE CORP)	13+75.0 TO 14+63.5	88.5 FT / 5.36 RODS
FEE (BASIN DISPOSAL)	14+63.5 TO 16+51.8	188.3 FT / 11.41 RODS
N.M. STATE HWY DEPT	16+51.8 TO 18+52.1	200.3 FT / 12.14 RODS
FEE (GOSNEY & SONS)	18+52.1 TO 30+24.2	1172.1 FT / 71.04 RODS
BLM	30+24.2 TO 44+72.5	1448.3 FT / 87.18 RODS

Prepared for:

CONOCO, INC.  
3315 BLOOMFIELD HWY  
FARMINGTON, NEW MEXICO 87402



Land Surveyor:  
Neale C. Edwards

Mailing Address:  
Post Office Box 6612  
Farmington, NM 87499

Business Address:  
111 East Pines Street  
Farmington, NM 87402  
(505) 325-2654 (Office)  
(505) 326-5650 (Fax)

**SURVEYS, INC.**

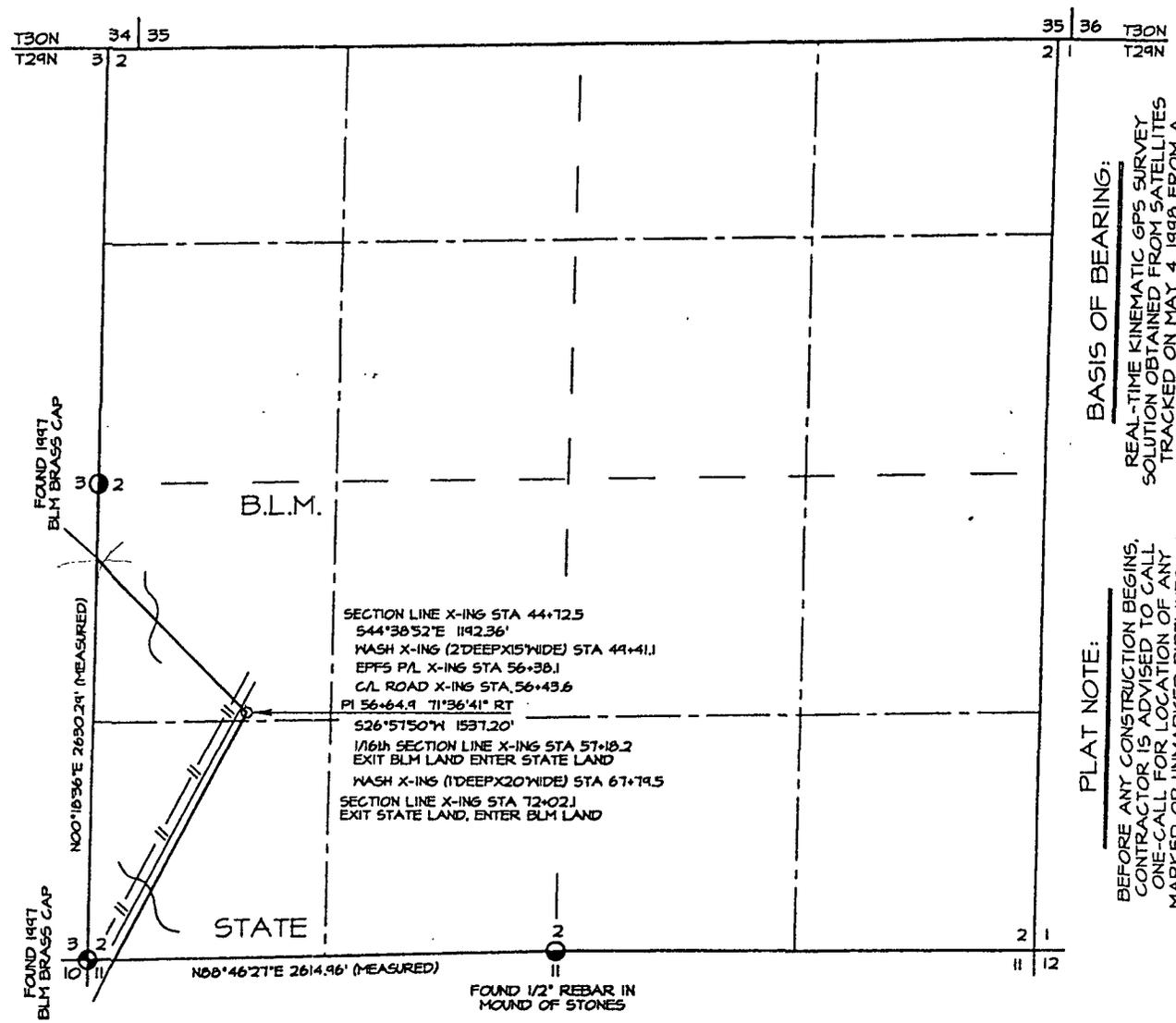
SHEET 1 OF 4  
FILENAME: 2411366  
CHECKED BY: NCE  
DRAWN BY: SLE

I, Neale C. Edwards, a Registered Professional Surveyor under the laws of the State of New Mexico, hereby certify that this plat was prepared from field notes of an actual survey meeting the minimum requirements of the standards for land surveys and is true and correct to the best of my knowledge and belief.

*Neale C. Edwards*  
Neale C. Edwards, P.L.S.  
N.M. R.L.S. #6857

Date: 5-29-98

**PROPOSED PIPELINE SURVEY FOR  
CONOCO, INC. WASTE DISPOSAL LINE  
W/2 SW/4 OF SECTION 2, T29N, R11W, NMPM,  
SAN JUAN COUNTY, NEW MEXICO**



**BASIS OF BEARING:**  
REAL-TIME KINEMATIC GPS SURVEY SOLUTION OBTAINED FROM SATELLITES TRACKED ON MAY 4, 1998 FROM A REFERENCE STATION POSITIONED IN THE SE/4 SW/4 OF SEC 11, T29N, R11W

**PLAT NOTE:**  
BEFORE ANY CONSTRUCTION BEGINS, CONTRACTOR IS ADVISED TO CALL ONE-CALL FOR LOCATION OF ANY MARKED OR UNMARKED PIPELINES OR CABLES IN THE AREA OF THIS PROJECT.

SECTION LINE X-ING STA 44+72.5  
544°30'52"E 1192.36'  
WASH X-ING (2'DEEP X15' WIDE) STA 44+41.1  
EFTS P/L X-ING STA 56+38.1  
C/L ROAD X-ING STA 56+43.6  
PI 56+64.9 71°36'41" RT  
526°51'50" W 1537.20'  
1/16th SECTION LINE X-ING STA 57+18.2  
EXIT BLM LAND ENTER STATE LAND  
WASH X-ING (1'DEEP X20' WIDE) STA 67+79.5  
SECTION LINE X-ING STA 72+02.1  
EXIT STATE LAND, ENTER BLM LAND

OWNERSHIP		
B.L.M.	44+72.5 TO 57+18.2	1245.7 FT / 75.50 RODS
STATE	57+18.2 TO 72+02.1	1483.9 FT / 89.93 RODS



I, Neale C. Edwards, a Registered Professional Surveyor under the laws of the State of New Mexico, hereby certify that this plat was prepared from field notes of an actual survey meeting the minimum requirements of the standards for land surveys and is true and correct to the best of my knowledge and belief.

*Neale C. Edwards* Date: 5-29-98  
Neale C. Edwards, P.L.S.  
N.M. R.L.S. #6857

Prepared for:  
**CONOCO, INC.**  
3315 BLOOMFIELD HWY  
FARMINGTON, NEW MEXICO 87402

**Land Surveyor:**  
Neale C. Edwards

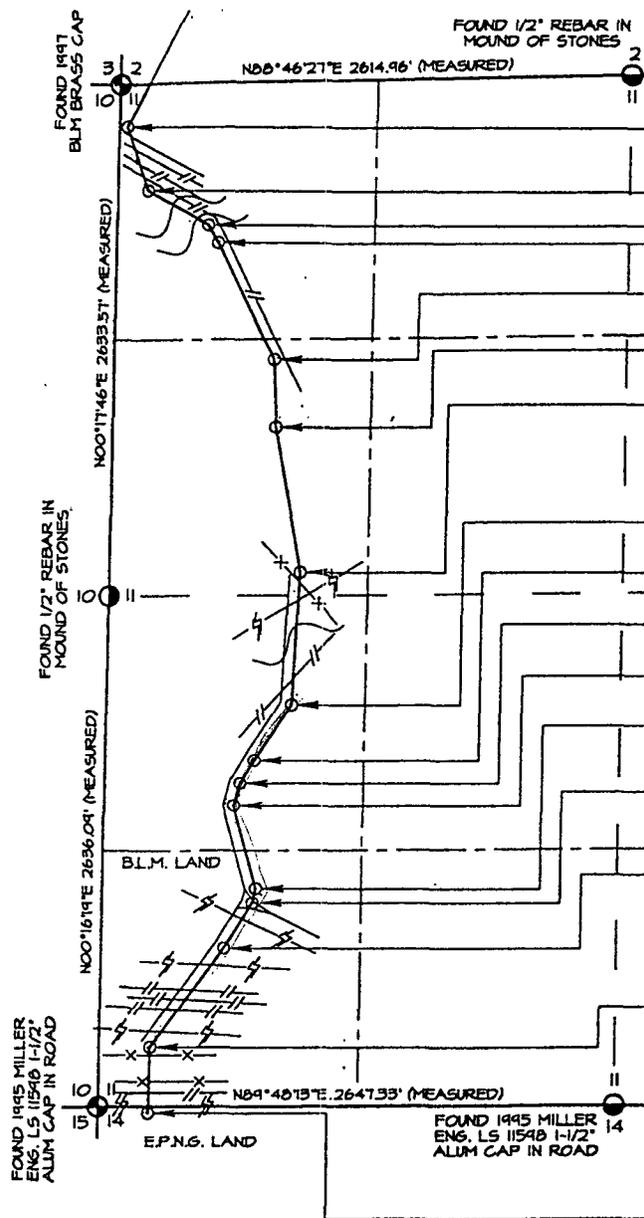
**Mailing Address:**  
Post Office Box 6612  
Farmington, NM 87499

**Business Address:**  
111 East Pinon Street  
Farmington, NM 87402  
(505) 325-2654 (Office)  
(505) 326-3650 (Fax)

**SURVEYS, INC.**

CHECKED BY: NCE  
DRAWN BY: SLE  
SHEET 2 OF 4  
FILENAME: 241216

# PROPOSED PIPELINE SURVEY FOR CONOCO, INC. WASTE DISPOSAL LINE W/2 W/2 SECTION 11, T29N, R11W, NMPM, SAN JUAN COUNTY, NEW MEXICO

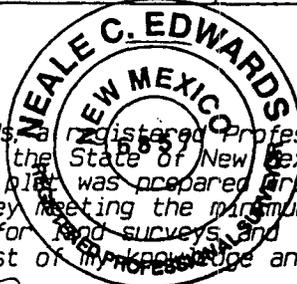


- SECTION LINE X-ING STA 72+02.1
- EXIT STATE LAND, ENTER BLM LAND
- S26°57'30"W 248.70'
- PI 74+30.8 46°13'12" LT
- C/L ROAD 20' OFFSET RT
- EPFS P/L 38' OFFSET RT
- S19°15'22"E 348.20'
- C/L ROAD X-ING STA 76+14.1
- EPFS P/L X-ING STA 76+14.1
- EPFS P/L X-ING STA 76+64.5
- EPFS P/L X-ING STA 77+76.6
- PI 77+99.0 41°03'30" LT
- EPFS P/L 15' OFFSET LT
- S60°20'52"E 357.07'
- C/L WASH X-ING (2'DX6"W) STA 78+14.8
- BEGIN WASH X-ING STA 78+92.4
- C/L WASH CHANNEL (4'DX30"W) STA 79+43.4
- C/L WASH CHANNEL (4'DX30"W) STA 80+54.5
- END WASH X-ING STA 81+33.9
- PI 81+56.9 30°38'40" RT
- EPFS P/L 15' OFFSET LT
- S29°42'12"E 104.11'
- PI 82+61.0 03°29'31" RT
- EPFS P/L 15' OFFSET LT
- S26°12'42"E 669.14'
- PI 84+30.2 23°41'53" RT
- EPFS P/L 15' OFFSET LT
- S02°22'46"E 346.47'
- PI 92+76.6 07°46'42" LT
- FENCE AROUND HOLDING TANK 20' LT
- S10°04'30"E 758.94'
- PI 100+35.6 12°46'26" RT
- 2-TRACK ROAD 10' OFFSET RT
- S02°36'56"W 680.03'
- FENCE-LINE X-ING STA 100+85.0
- OH POWER X-ING (3-WIRE) STA 101+14.6
- C/L WASH X-ING (3'DX6"W) STA 101+48.0
- POSSIBLE P/L X-ING STA 106+81.0
- PI 107+15.6 29°31'40" RT
- 2-TRACK ROAD 13' OFFSET RT
- S32°08'35"W 338.81'
- PI 110+54.4 01°50'15" LT
- 2-TRACK ROAD 10' OFFSET RT
- S30°18'20"W 139.56'
- PI 111+44.0 15°16'16" LT
- 2-TRACK ROAD 18' OFFSET RT
- S15°02'04"W 119.80'
- PI 113+13.8 30°33'44" LT
- 2-TRACK ROAD 8' OFFSET RT
- S15°31'44"E 450.49'
- PI 117+64.2 26°51'41" RT
- 2-TRACK ROAD 11' OFFSET RT
- S11°19'31"W 76.63'
- 2-TRACK ROAD X-ING STA 118+25.7
- PI 118+40.9 19°59'15" RT
- 2-TRACK ROAD 10' OFFSET RT
- S31°19'11"W 274.69'
- 2-TRACK ROAD X-ING STA 118+54.8
- OH POWER X-ING (1-WIRE) STA 119+36.5
- PI 121+15.6 04°32'58" RT
- 2-TRACK ROAD 7' OFFSET RT
- S35°52'09"W 628.31'
- OH POWER X-ING (6-WIRE) STA 125+19.4
- EPFS P/L X-ING STA 126+12.5
- EPFS P/L X-ING STA 126+35.6
- EPFS P/L X-ING STA 126+62.6
- OH POWER X-ING (4-WIRE) STA 126+72.5
- PI 127+43.9 34°55'38" LT
- 2-TRACK ROAD 8' OFFSET RT
- S00°56'32"W 337.31'
- ENTER TRANS-COLORADO PIPE YARD • FENCE STA 127+48.3
- EXIT TRANS-COLORADO PIPE YARD • FENCE STA 130+11.6
- P/M P/L X-ING STA 130+16.3
- BEGIN PAVED ROAD X-ING STA 130+38.0
- SECTION LINE X-ING STA 130+49.1
- EXIT BLM LAND, ENTER EL PASO LAND
- END PAVED ROAD X-ING STA 130+60.7
- P/M P/L X-ING STA 130+70.9
- OH POWER X-ING (5-WIRE) STA 130+79.0
- END-OF-SURVEY • STA 130+81.2
- NORTH LINE OF FENCE AROUND CONOCO PLANT
- TIE TO NW CORNER OF SECTION 14
- N83°14'45"W 265.54'

**PLAT NOTE:**  
BEFORE ANY CONSTRUCTION BEGINS,  
CONTRACTOR IS ADVISED TO CALL  
ONE-CALL FOR LOCATION OF ANY  
MARKED OR UNMARKED PIPELINES OR  
CABLES IN THE AREA OF THIS PROJECT.

**BASIS OF BEARING:**  
REAL-TIME KINEMATIC GPS SURVEY  
SOLUTION OBTAINED FROM SATELLITES  
TRACKED ON MAY 4, 1998 FROM A  
REFERENCE STATION POSITIONED IN  
THE SE/4 SW/4 OF SEC 11, T29N, R11W

OWNERSHIP		
B.L.M.	72+02.1 TO 130+49.1	5847.0 FT / 354.36 RODS
E.P.N.G.	130+49.1 TO 130+81.2	32.1 FT / 1.95 RODS



I, Neale C. Edwards, a Registered Professional Surveyor under the laws of the State of New Mexico, hereby certify that this plat was prepared from field notes of an actual survey meeting the minimum requirements of the standards for land surveys and is true and correct to the best of my professional knowledge and belief.

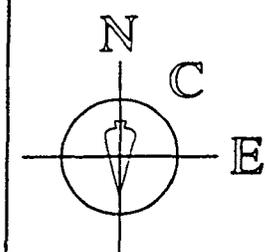
*Neale C. Edwards* Date: 5-29-98  
Neale C. Edwards, P.L.S.  
N.M. R.L.S. #6857

Prepared for:  
CONOCO, INC.  
3315 BLOOMFIELD HWY  
FARMINGTON, NEW MEXICO 87402

Land Surveyor:  
Neale C. Edwards

Mailing Address:  
Post Office Box 6612  
Farmington, NM 87499

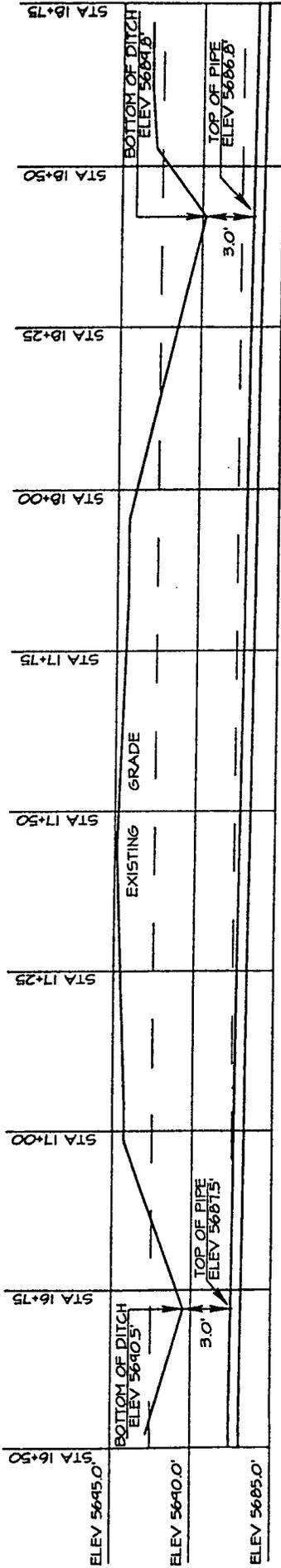
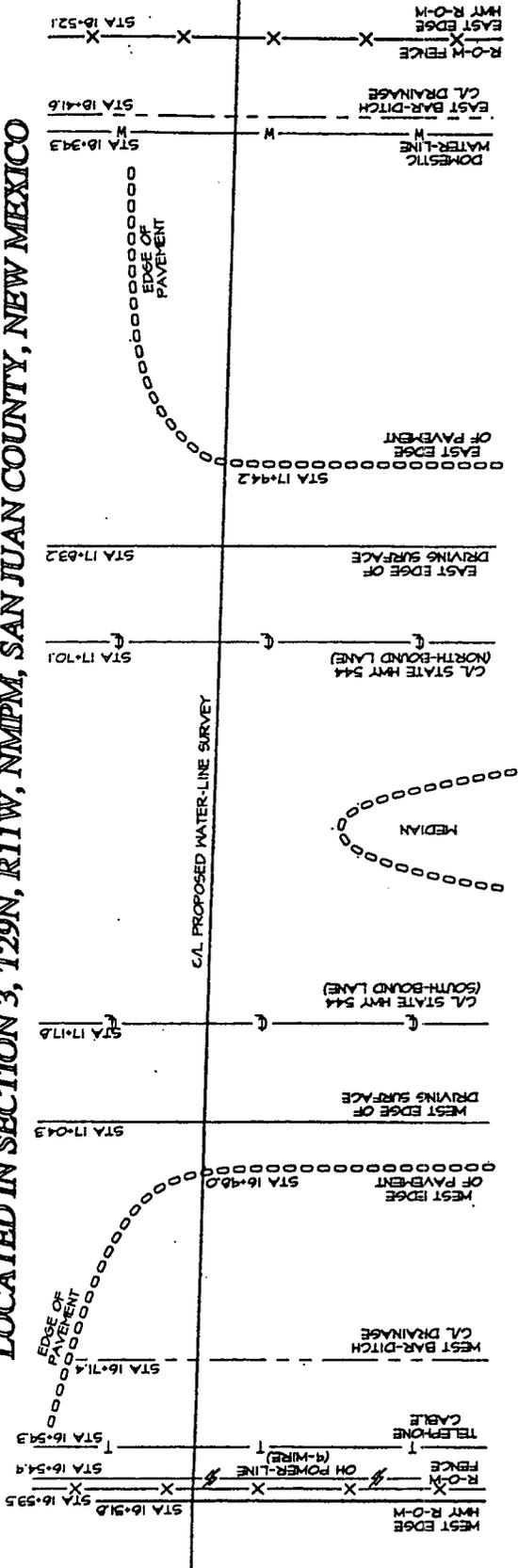
Business Address:  
111 East Pecos Street  
Farmington, NM 87402  
(505) 325-2634 (Office)  
(505) 326-5630 (Fax)



**SURVEYS, INC.**

CHECKED BY: NCE  
DRAWN BY: SLE  
SHEET 3 OF 4  
FILENAME: 2411106

**N.M. STATE HWY 544 PROFILE SURVEY FOR CONOCO, INC. WASTE DISPOSAL LINE  
LOCATED IN SECTION 3, T29N, R11W, NMPM, SAN JUAN COUNTY, NEW MEXICO**

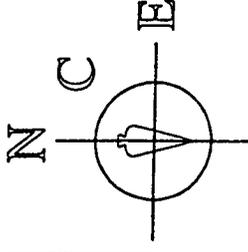
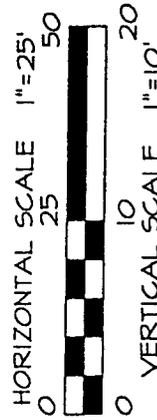


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*Neale C. Edwards*  
Date: 5-29-98  
Neale C. Edwards, P.L.S.  
N.M. R.L.S. #6857

Prepared for:

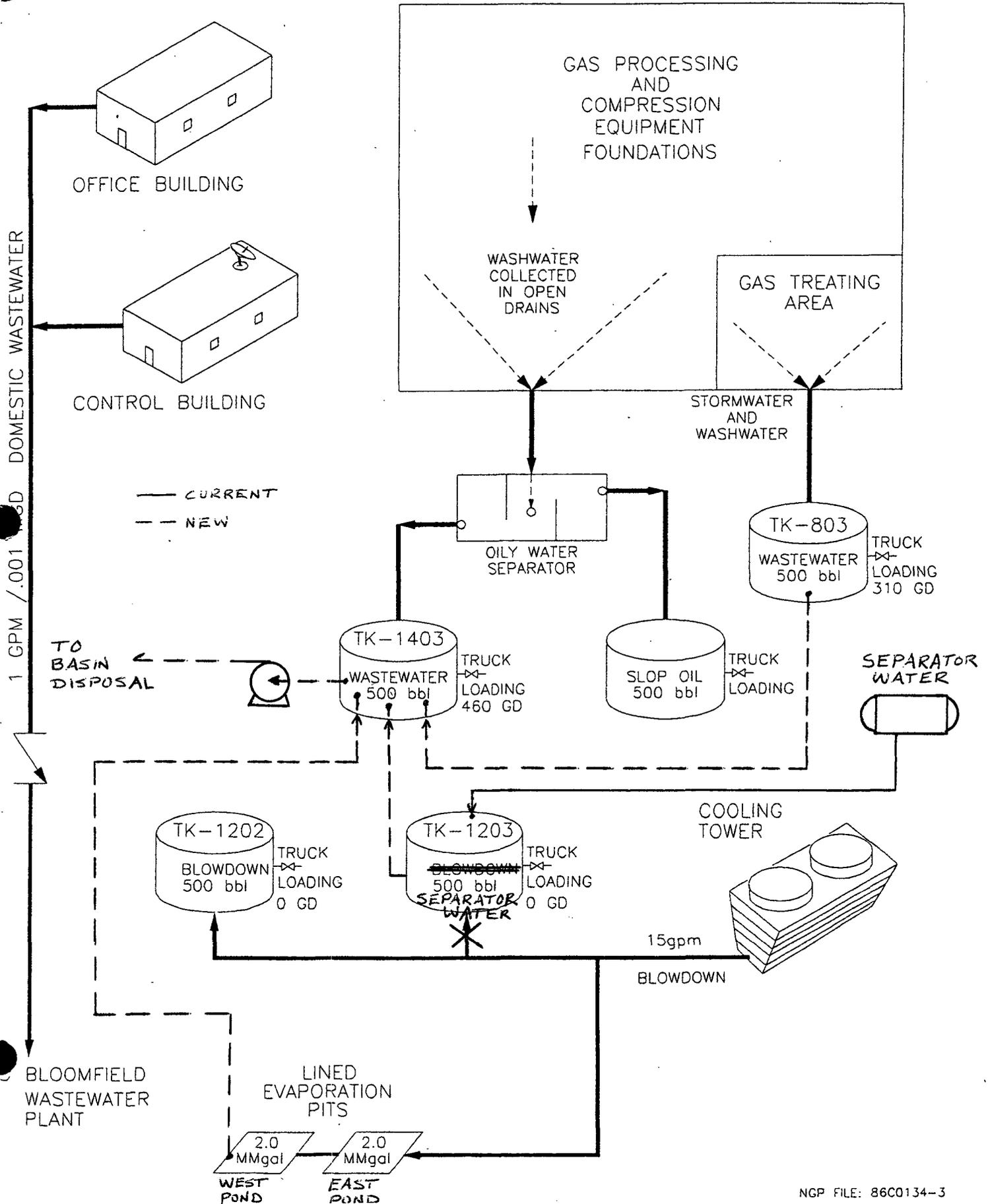
CONOCO, INC.  
3315 BLOOMFIELD HWY  
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(505) 325-2654 (Office)  
(505) 326-5650 (Fax)

**SURVEYS, INC.**

# SCHEMATIC DIAGRAM WASTEWATER DRAINAGE SYSTEM CONOCO, INC. SAN JUAN BASIN PLANT





Phone (505) 326-4737 Fax (505) 325-4182

2506 West Main Street, Farmington, NM 87401

Client: Conoco, Inc. Bloomfield
Project: San Juan Plant
Sample ID: Amine System Storm Water Tank TK803
Lab ID: 0399W04842
Matrix: Water
Condition: Cool/Intact

Date Received: 09/24/99
Date Reported: 10/11/99
Date Sampled: 09/24/99
Time Sampled: 1335

Table with columns: Parameter, Analytical Result, Units, Units, PQL, Method, Date, Time, Analysis Init. Rows include GENERAL PARAMETERS (Phenols, Oil & Grease, Solids) and TOTAL METALS (Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, Silver).

Reference: EPA - "Methods for Chemical Analysis of Water and Wastes (MCAWW)" - EPA/600/4-79-020 - March, 1983.
SM - "Standard Methods for the Examination of Water and Wastewater", APHA-AWWA-WEF, 19th Edition, 1995.
EPA - "Methods for the Determination of Metals in Environmental Samples" - Supplement I - 600/R-94-111 - May, 1994.

Reviewed By: [Signature]



# CHAIN OF CUSTODY RECORD

Client/Project Name		Project Location		ANALYSES / PARAMETERS			
CANCELO SAN JUAN GAS PLANT		AMINE SYSTEM					
Sampler (Signature) Richard M. Moore		Storm Water Tank					
Chain of Custody Tape No.							
Sample No./ Identification	Date	Time	Lab Number	Matrix	No. of Containers	Remarks	
1	9-24-99	1335		4842	1		
2	9-24-99	1335			1		
3	9-24-99	1330			1		
4	9-24-99	1337			1		
4b	9-24-99	1337			1		
<i>SA</i>							
Reinquished by: (Signature) Richard M. Moore							
Date		Time		Received by: (Signature)		Time	
9-24-99		1405					
Reinquished by: (Signature)							
Date		Time		Received by: (Signature)		Time	
Reinquished by: (Signature)							
Date		Time		Received by laboratory: (Signature)		Time	

Inter-Mountain Laboratories, Inc.

- 555 Absaraka Sheridan, Wyoming 82801 Telephone (307) 674-7506
- 1633 Terra Avenue Sheridan, Wyoming 82801 Telephone (307) 672-8945
- 1701 Phillips Circle Gillette, Wyoming 82718 Telephone (307) 682-8945
- 2506 West Main Street Farmington, NM 87401 Telephone (505) 326-4737
- 11183 State Hwy. 30 College Station, TX 77845 Telephone (409) 776-8945

01724



# Inter-Mountain Laboratories, Inc.

Phone (505) 326-4737 Fax (505) 325-4182

2506 West Main Street, Farmington, NM 87401

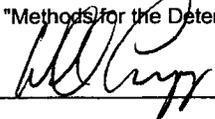
**Client:** Conoco, Inc. Bloomfield  
**Project:** San Juan Plant  
**Sample ID:** Process Waste Water Tank TK1203  
**Lab ID:** 0399W04841  
**Matrix:** Water  
**Condition:** Cool/Intact

**Date Received:** 09/24/99  
**Date Reported:** 10/11/99  
**Date Sampled:** 09/24/99  
**Time Sampled:** 1137

Parameter	Analytical		Units	PQL	Method	Analysis		
	Result	Units				Date	Time	Init.
<b>GENERAL PARAMETERS</b>								
Phenols	0.08	mg/L		0.01	EPA 420.1	09/30/99	1500	AP
Oil & Grease	<1	mg/L		1	EPA 413.2	10/06/99	0800	SW
Solids - Total Dissolved	930	mg/L		10	EPA 160.1	09/27/99	0800	JP
<b>TOTAL METALS</b>								
Arsenic	<0.005	mg/L		0.005	SM 3114B	10/07/99	1045	HR
Barium	0.06	mg/L		0.01	EPA 200.7	10/01/99	1242	WL
Cadmium	<0.001	mg/L		0.001	EPA 200.9	10/01/99	1442	SW
Chromium	0.02	mg/L		0.01	EPA 200.7	10/01/99	1242	WL
Lead	<0.005	mg/L		0.005	EPA 200.9	10/04/99	0830	SW
Mercury	0.009	mg/L		0.001	EPA 245.1	09/30/99	1130	HR
Selenium	<0.005	mg/L		0.005	SM 3114B	09/30/99	1335	HR
Silver	<0.01	mg/L		0.01	EPA 200.7	10/01/99	1242	WL

Reference: EPA - "Methods for Chemical Analysis of Water and Wastes (MCAWW)" - EPA/600/4-79-020 - March, 1983.  
 SM - "Standard Methods for the Examination of Water and Wastewater", APHA-AWWA-WEF, 19th Edition, 1995.  
 EPA - "Methods for the Determination of Metals in Environmental Samples" - Supplement I - 600/R-94-111 - May, 1994.

Reviewed By:





# CHAIN OF CUSTODY RECORD

Client/Project Name	Project Location	ANALYSES / PARAMETERS				
CONOCO SAN JUAN GAS PLANT	PROCESS WASTEWATER TANK					
Sampler: (Signature) <i>Richard M. Moore</i>	Chain of Custody Tape No.	No. of Containers	Matrix	Remarks		
1	9-24-99 1137	1	4841	TDS, PH, HEAVY METALS, PHTENOLS, OIL+GREASE		
2	9-24-99 1170	1				
3	9-24-99 1142	1				
4a	9-24-99 1144	1				
4b	9-24-99 1144	1				
<i>[Large handwritten signature/initials]</i>						
Relinquished by: (Signature) <i>Richard M. Moore</i>	Date	Time	Received by: (Signature)	Date	Time	
	9-24-99	1405	<i>[Signature]</i>			
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time	
			<i>[Signature]</i>			
Relinquished by: (Signature) <i>[Signature]</i>	Date	Time	Received by laboratory: (Signature)	Date	Time	
			<i>[Signature]</i>			
Inter-Mountain Laboratories, Inc.						
<input type="checkbox"/> 555 Absaraka Sheridan, Wyoming 82801 Telephone (307) 674-7506	<input type="checkbox"/> 1633 Terra Avenue Sheridan, Wyoming 82801 Telephone (307) 672-8945	<input checked="" type="checkbox"/> 1701 Phillips Circle Gillette, Wyoming 82718 Telephone (307) 682-8945	<input checked="" type="checkbox"/> 2506 West Main Street Farmington, NM 87401 Telephone (505) 326-4737	<input type="checkbox"/> 11183 State Hwy. 30 College Station, TX 77845 Telephone (409) 776-8945	61618	



Phone (505) 326-4737 Fax (505) 325-4182

2506 West Main Street, Farmington, NM 87401

Client: Conoco, Inc. Bloomfield
Project: San Juan Plant
Sample ID: West Water Treatment Pond
Lab ID: 0399W04840
Matrix: Water
Condition: Cool/Intact

Date Received: 09/24/99
Date Reported: 10/11/99
Date Sampled: 09/24/99
Time Sampled: 1123

Table with columns: Parameter, Analytical Result, Units, Units, PQL, Method, Date, Time, Init. Rows include GENERAL PARAMETERS (Phenols, Oil & Grease, Solids - Total Dissolved) and TOTAL METALS (Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium, Silver).

Reference: EPA - "Methods for Chemical Analysis of Water and Wastes (MCAWW)" - EPA/600/4-79-020 - March, 1983.
SM - "Standard Methods for the Examination of Water and Wastewater", APHA-AWWA-WEF, 19th Edition, 1995.
EPA - "Methods for the Determination of Metals in Environmental Samples" - Supplement I - 600/R-94-111 - May, 1994.

Reviewed By: [Signature]





Quality Control Report  
Duplicate Analysis

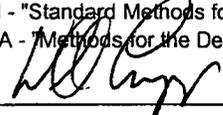
Client: Conoco, Inc. Bloomfield  
Project: San Juan Plant  
Sample ID: East Water Treatment Pond  
Lab ID: 0399W04839  
Matrix: Water  
Condition: Cool/Intact

Report Date: 10/11/99  
Receipt Date: 09/24/99  
Sample Date: 09/24/99  
Time Sampled: 1110

Parameter	Original Conc.	Duplicate Conc.	Relative % Diff.	PQL	Units
Solids - Total Dissolved	7,200	7,210	0	10	mg/L
Arsenic	0.025	0.024	0.001**	0.005	mg/L
Barium	0.63	<0.01	NC*	0.01	mg/L
Cadmium	<0.001	<0.001	NC*	0.001	mg/L
Chromium	<0.01	<0.01	NC*	0.01	mg/L
Lead	<0.005	<0.005	NC*	0.005	mg/L
Mercury	<0.001	<0.001	NC*	0.001	mg/L
Selenium	<0.005	<0.005	NC*	0.005	mg/L
Silver	<0.01	<0.01	NC*	0.01	mg/L

\*NC - Non-Calculable RPD due to value(s) less than DL \*\* - Difference used for results < 5 X Detection Limit

Reference: EPA - "Methods for Chemical Analysis of Water and Wastes (MCAWW)" - EPA/600/4-79-020 - March, 1983.  
SM - "Standard Methods for the Examination of Water and Wastewater", APHA-AWWA-WEF, 19th Edition, 1995.  
EPA - "Methods for the Determination of Metals in Environmental Samples" - Supplement I - 600/R-94-111 - May, 1994.

Reviewed By: 



# Inter-Mountain Laboratories, Inc.

Phone (505) 326-4737 Fax (505) 325-4182

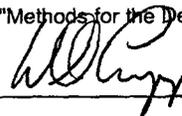
2506 West Main Street, Farmington, NM 87401

Client: **Conoco, Inc. Bloomfield**  
 Project: **San Juan Plant**  
 Sample ID: **East Water Treatment Pond**  
 Lab ID: **0399W04839**  
 Matrix: **Water**  
 Condition: **Cool/Intact**

Date Received: **09/24/99**  
 Date Reported: **10/11/99**  
 Date Sampled: **09/24/99**  
 Time Sampled: **1110**

Parameter	Analytical Result	Units	Units	PQL	Method	Analysis		
						Date	Time	Init.
<b>GENERAL PARAMETERS</b>								
Phenols	0.19	mg/L		0.01	EPA 420.1	09/30/99	1500	AP
Oil & Grease	<1	mg/L		1	EPA 413.2	10/06/99	0800	SW
Solids - Total Dissolved	7,200	mg/L		10	EPA 160.1	09/27/99	0800	JP
<b>TOTAL METALS</b>								
Arsenic	0.025	mg/L		0.005	SM 3114B	10/07/99	1045	HR
Barium	0.63	mg/L		0.01	EPA 200.7	09/29/99	1616	WL
Cadmium	<0.001	mg/L		0.001	EPA 200.9	10/01/99	1442	SW
Chromium	<0.01	mg/L		0.01	EPA 200.7	09/29/99	1616	WL
Lead	<0.005	mg/L		0.005	EPA 200.9	10/04/99	0830	SW
Mercury	<0.001	mg/L		0.001	EPA 245.1	09/30/99	1130	HR
Selenium	<0.005	mg/L		0.005	SM 3114B	09/30/99	1335	HR
Silver	<0.01	mg/L		0.01	EPA 200.7	09/29/99	1616	WL

Reference: EPA - "Methods for Chemical Analysis of Water and Wastes (MCAWW)" - EPA/600/4-79-020 - March, 1983.  
 SM - "Standard Methods for the Examination of Water and Wastewater", APHA-AWWA-WEF, 19th Edition, 1995.  
 EPA - "Methods for the Determination of Metals in Environmental Samples" - Supplement I - 600/R-94-111 - May, 1994.

Reviewed By: 





Conoco Inc.  
San Juan Gas Plant  
P.O. Box 217  
Bloomfield, NM 87413  
(505) 632-4900

GW-035

October 22, 1998

22

Roger C. Anderson  
Environmental Bureau Chief  
New Mexico Energy, Minerals & Natural Resources Dept.  
Oil Conservation Division  
2040 South Pacheco Street  
Santa Fe, New Mexico 87505

Dear Mr. Anderson,

Enclosed, please find the results of the additional test we have conducted with material from our west evaporation pond.

I am talking with Waste Management for disposal and wanted to run an analysis by you for your input and approval for this disposal site. (Crouch Mesa)

If you should have any questions, please feel free to contact me at (505) 632-4905.

Sincerely,

David S. Friess  
Maintenance Technician III

CONOCO TO SEND IN  
PERMIT MOD ADDING WASTE  
STREAM!  
3/8/99  
WYATT PRISS

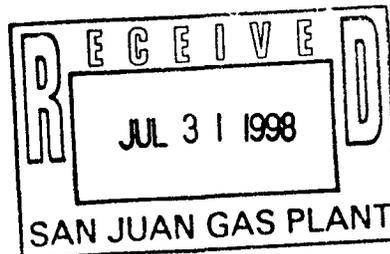


NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

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

July 29, 1998

**CERTIFIED MAIL**  
**RETURN RECEIPT NO. Z-357-869-973**



Mr. David Friess  
Conoco Inc.  
P.O. Box 217  
Bloomfield, New Mexico 87413

Dear Mr Friess:

The Oil Conservation Division (OCD) has received your request dated July 21, 1998 to transfer a slurry of water and sediment from the lined evaporation pond to an unlined catch basin. In order to process your request the following information must be supplied:

1. a general chemistry analysis of the sludge
2. the depth to ground water directly beneath the proposed catch basin
3. the exact location of the catch basin (supply a plant diagram with the basin shown)

If you have any questions please call me at (505) 827-7152.

Sincerely:

Roger C. Anderson  
Environmental Bureau Chief

xc: OCD Aztec

# Flash Point

Client: **Conoco, Inc.**  
Project: San Juan Gas Plant  
Sample ID: #3  
Laboratory ID: 0398G05630  
Sample Matrix: Soil  
Condition: Intact

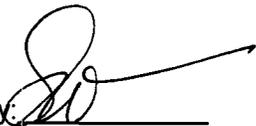
Date Reported: 10/02/98  
Date Sampled: 09/29/98  
Date Received: 09/29/98  
Date Analyzed: 10/01/98

Analyte	Result	Units
Flash Point	>140	°F

**References:**

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

Annual Book of ASTM Standards, Method D56.

Reported by: Reviewed by: 

# Quality Control / Quality Assurance

## Known Analysis FLASH POINT

Client: **Conoco, Inc.**  
Project: **San Juan Gas Plant**  
Sample Matrix: **Soil**

Date Reported: **10/02/98**  
Date Analyzed: **10/01/98**  
Date Received: **09/29/98**

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

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

Annual Book of ASTM Standards, Method D56.

**Comments:**

Reported by  \_\_\_\_\_

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

**Conoco, Inc / San Juan Plant****Set ID: 0398W05567**

Lab ID	Sample ID	Sampled		Received	
		Date	Time	Date	Time
0398W05567	#1	09/22/98	0800	09/22/98	1234
0398W05568	#2	09/22/98	0830	09/22/98	1234

**Parameters:**

Alkalinity (CaCO<sub>3</sub>), Anion Sum, Bicarbonate (HCO<sub>3</sub>), Calcium, Carbonate (CO<sub>3</sub>), Cation Sum, Cation/Anion Balance, Chloride, Electrical Conductivity, Hardness (CaCO<sub>3</sub>), Hydroxide (OH), Magnesium, PH, Potassium, Sodium, Solids - Total Dissolved, Sulfate

Total Metals - Water (3010) - Iron

2506 W Main Street  
Farmington, New Mexico 87401

Client: Conoco, Inc  
Project: San Juan Plant  
Sample ID: #1  
Lab ID: 0398W05567  
Matrix: Soil  
Condition: Intact

Date Received: 09/22/98  
Date Reported: 10/05/98  
Date Sampled: 09/22/98  
Time Sampled: 0800

**Analytical Results**

**GENERAL PARAMETERS**

Parameter	Result	Units	Units
PH	6.7		S.u.
Electrical Conductivity	34,000		µmhos/cm
Solids - Total Dissolved	36,400		mg/L
Alkalinity (CaCO3)	393		mg/L
Hardness (CaCO3)	7,660		mg/L
<b>Major Cations</b>			
Calcium	482	mg/L	24.1 meq/L
Magnesium	1,570	mg/L	129 meq/L
Potassium	844	mg/L	21.6 meq/L
Sodium	4,580	mg/L	199 meq/L
<b>Major Anions</b>			
Sulfate	10,800	mg/L	225 meq/L
Bicarbonate (HCO3)	470	mg/L	7.85 meq/L
Chloride	6,240	mg/L	176 meq/L
<b>Cation / Anion Balance QC Information</b>			
Cation Sum	374	meq/L	
Anion Sum	408	meq/L	
Cation/Anion Balance	4.4	%	

*Glenrd Peltier*

Post-It™ brand fax transmittal memo 7671 # of pages > 2

To <i>David Friess</i>	From <i>IML</i>
Co. <i>Conoco</i>	Co. <i>IML</i>
Dept.	Phone #
Fax #	Fax #

Reference: EPA - "Methods for Chemical Analysis of Water and Wastes (MCAWW)" - EPA/600/4-79-020 - March, 1983.  
EPA - "Methods for the Determination of Metals in Environmental Samples" - Supplement I - 600/R-94-111 - May, 1994.

Reviewed By: *[Signature]*



Submit 4 Copies  
to Appropriate  
District Office

*Jim K. Foust*

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

**OIL CONSERVATION DIVISION**  
P.O. Box 2088  
Santa Fe, New Mexico 87504-2088

DISTRICT II  
P.O. Drawer DD, Artesa, 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  
Ur. 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. 3

**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



NEW MEXICO ENERGY, MINERALS  
& NATURAL RESOURCES DEPARTMENT

Martyné Kieling  
FYI

OIL CONSERVATION DIVISION  
AZTEC DISTRICT OFFICE  
AZTEC NM 87410  
(505) 334-6178 FAX: (505) 334-6170  
[http://emnr.d.state.nm.us/ocd/District III/district.htm](http://emnr.d.state.nm.us/ocd/District%20III/district.htm)

GARY E. JOHNSON  
GOVERNOR

Discharge Plan  
GW 035

Jennifer A. Salisbury  
CABINET SECRETARY

MAR 22 1998

Certified Receipt #P 471 215 209

March 12, 1998

Conoco Inc  
San Juan Gas Plant  
Attn David Friess  
PO Box 217  
Bloomfield NM 87413

RE: Used Sulfa-Clean Material Generated at Arrowhead Pump Station

Dear Mr. Friess:

Based on your letter of March 11, 1998 stating your NORM testing showed a reading of 8 microrem/hour, the MSDS sheet and analytical data from Quanterra labs, the used Sulfa-Clean product may be disposed of at a public landfill without objection from the Oil Conservation Division. OCD approval does not relieve Conoco Inc. of responsibility for compliance with any other state, federal and local laws and/or regulations for disposing of waste at a public landfill.

Please feel free to contact me if you have questions.

Yours truly,

*Denny G. Foust*  
Denny G. Foust  
Environmental Geologist

DGF/sh

xc: DGF File  
Santa Fe-Environmental Bureau

MJK 3/27/98



Conoco Inc.  
San Juan Gas Plant  
P.O. Box 217  
Bloomfield, NM 87413  
(505) 632-4900

March 11, 1998

Mr. Denny Foust  
Oil Conservation District  
Aztec Division  
Aztec, NM

RECEIVED  
MAR 12 1998  
OIL CONSERVATION DISTRICT  
AZTEC, NM

Dear Mr. Foust,

As per our conversation earlier this month, Conoco has completed a norm survey on the Sulfa-Clean Material that we are wanting to dispose of at the San Juan County Landfill.

The following test was performed by John Cabot, Conoco Rocky Mountain District Safety Coordinator:

The survey equipment used was a Lud-Lum Model 3 Survey Meter. The Background Check showed a level of 4 microrem/hour and the Sulfa Clean material itself showed a level of 8 microrem/hour.

I am faxing this letter along with a Waste Generators Profile Sheet and the Analytical Data from Quanterra Labs.

If you have any questions or need to contact me please call (505)632-4905.

Thank you for your assistance.

Sincerely,

David S. Friess



# GENERATOR'S WASTE PROFILE SHEET

PLEASE PRINT IN INK OR TYPE

Service Agreement on File?  YES  NO  
 Hazardous  Non-Hazardous  TSCA

Profile Number: WMI **CD 2349**  
Renewal Date: 10/9/2000

## A. Waste Generator Information

- 1. Generator Name: Conoco San Juan Gas Plant 2
- 2. SIC Code: \_\_\_\_\_
- 3. Facility Street Address: 61 CR 4900
- 4. Phone: (505) 632-4900
- 5. Facility City: Bloomfield N.M
- 6. State/Province: \_\_\_\_\_
- 7. Zip/Postal Code: 87413
- 8. Generator USEPA/Federal ID #: \_\_\_\_\_
- 9. County: SAN JUAN
- 10. State/Province ID #: \_\_\_\_\_
- 11. Customer Name: CONOCO
- 12. Customer Phone: ( )
- 13. Customer Contact: LANE AYERS
- 14. Customer Fax: \_\_\_\_\_
- 15. Billing Address P.O. BOX 217 Bloomfield N.M 87413  Same as above

## B. Waste Stream Information

- 1. Description
  - a. Name of Waste: SulfA clean
  - b. Process Generating Waste: Gas Sweetening

c. Color <u>BLACK</u>	d. Strong odor (describe): <u>NONE</u>	e. Physical state @ 70°F <input checked="" type="checkbox"/> Solid <input type="checkbox"/> Liquid <input type="checkbox"/> Gas <input type="checkbox"/> Sludge <input type="checkbox"/> Other	f. Layers <input checked="" type="checkbox"/> Single Layer <input type="checkbox"/> Multi-layer	g. Free liquid range _____ to _____ % h. pH: Range _____ to _____ %
--------------------------	---	---	---	--

- i. Liquid Flash Point:  <73°F  73-99°F  100-139°F  140-199°F  ≥ 200°F  Not applicable
- j. Chemical Composition (List all constituents [including halogenated organics, debris, and UHC's] present in any concentration and submit representative analysis):

Constituents	Concentration Range	Constituents	Concentration Range

TOTAL COMPOSITION MUST EQUAL OR EXCEED 100%

- k.  Oxidizer  Pyrophoric  Explosive  Radioactive  
 Carcinogen  Infectious  Shock Sensitive  Water Reactive
- l. Does the waste represented by this profile contain any of the carcinogens which require OSHA notification? (list in Section B.1.j).....  YES  NO
- m. Does the waste represented by this profile contain dioxins? (list in Section B.1.j).....  YES  NO
- n. Does the waste represented by this profile contain asbestos?.....  YES  NO  
If yes.....  friable  non-friable
- o. Does the waste represented by this profile contain benzene?.....  YES  NO  
If yes, concentration \_\_\_\_\_ ppm  
Is the waste subject to the benzene waste operations NESHAP?.....  YES  NO
- p. Is the waste subject to RCRA Subpart CC controls?.....  YES  NO  
If yes, volatile organic concentration \_\_\_\_\_ ppmw
- q. Does the waste contain any Class I or Class II ozone-depleting substances?.....  YES  NO
- r. Does the waste contain debris? (list in Section B.1.j).....  YES  NO

## 2. Quantity of Waste

Estimated Annual Volume 25  Tons  Yards  Drums  Other (specify) \_\_\_\_\_

## 3. Shipping Information

- a. Packaging:
  - Bulk Solid; Type/Size: \_\_\_\_\_  Bulk Liquid; Type/Size: \_\_\_\_\_
  - Drum; Type; Size: \_\_\_\_\_  Other: \_\_\_\_\_
- b. Shipping Frequency: Units 4 Per:  Month  Quarter  Year  One time  Other
- c. Is this a U.S. Department of Transportation (USDOT) Hazardous Material? (If no, skip d, e, and f).....  YES  NO



# GENERATOR'S WASTE PROFILE SHEET

PLEASE PRINT IN INK OR TYPE

- d. Reportable Quantity (lbs.; kgs.): \_\_\_\_\_ e. Hazard Class/ID #: \_\_\_\_\_
- f. USDOT Shipping Name: \_\_\_\_\_
- g. Personal Protective Equipment Requirements: Cotton Gloves, Safety Glasses
- h. Transporter/Transfer Station: Riley Industrial/Waste Management

### C. Generator's Certification (Please check appropriate responses, sign, and date below.)

1. Is this a USEPA hazardous waste (40 CFR Part 261)? If the answer is no, skip to 2.  YES  NO
  - a. If yes, identify ALL USEPA listed and characteristic waste code numbers (D, F, K, P, U) \_\_\_\_\_
  - b. If a characteristic hazardous waste, do underlying hazardous constituents (UHCs) apply? (if yes, list in Section B.1.j)  YES  NO
  - c. Does this waste contain debris? (if yes, list size and type in Chemical Composition - B.1.)  YES  NO
2. Is this a state hazardous waste?  YES  NO  
Identify ALL state hazardous waste codes \_\_\_\_\_
3. Is the waste from a CERCLA (40 CFR 300, Appendix B) or state mandated clean-up?  YES  NO  
If yes, attach Record of Decision (ROD), 104/106 or 122 order or court order that governs site clean-up activity. For state mandated clean-up, provide relevant documentation.
4. Does the waste represented by this waste profile sheet contain radioactive material, or is disposal regulated by the Nuclear Regulatory Commission?  YES  NO
5. Does the waste represented by this waste profile sheet contain concentrations of Polychlorinated Biphenyls (PCBs) regulated by 40 CFR 761? (if yes, list in Chemical Composition - B.1.j)  YES  NO
  - a. If yes, were the PCBs imported into the U.S.?  YES  NO
6. Do the waste profile sheet and all attachments contain true and accurate descriptions of the waste material, and has all relevant information within the possession of the Generator regarding known or suspected hazards pertaining to the waste been disclosed to the Contractor?  YES  NO
7. Will all changes which occur in the character of the waste be identified by the Generator and disclosed to the Contractor prior to providing the waste to the Contractor?  YES  NO

Check here if a Certificate of Destruction or Disposal is required.

Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. I authorize WMI to obtain a sample from any waste shipment for purposes of recertification. If this certification is made by a broker, the undersigned signs as authorized agent of the generator and has confirmed the information contained in this Profile Sheet from information provided by the generator and additional information as it has determined to be reasonably necessary. If approved for management, Contractor has all the necessary permits and licenses for the waste that has been characterized and identified by this approved profile.

Certification Signature: David Friess Conoco inc Title: Plant Tech III  
 Name (Type or Print): \_\_\_\_\_ Company Name: Conoco Date: \_\_\_\_\_  
 Check if additional information is attached. Indicate the number of attached pages \_\_\_\_\_

D. WMI Management's Decision	FOR WMI USE ONLY
1. Management Method <input type="checkbox"/> Landfill <input type="checkbox"/> Non-hazardous Solidification <input type="checkbox"/> Bioremediation <input type="checkbox"/> Incineration <input type="checkbox"/> Hazardous Stabilization <input type="checkbox"/> Other (Specify) _____	
2. Proposed Ultimate Management Facility: _____	
3. Precautions, Special Handling Procedures, or Limitation on Approval: _____	
4. Waste Form _____	5. Source _____
6. System Type _____	
Special Waste Decision: _____	<input type="checkbox"/> Approved <input type="checkbox"/> Disapproved
Salesperson's Signature: _____	Date: _____
Division Approval Signature (Optional): _____	Date: _____
Special Waste Approvals Person Signature: _____	Date: _____

**Certificate of  
Analysis**

Quanterra Incorporated  
5307 Industrial Oaks Boulevard, Suite 160  
Austin, Texas 78735

512 892-6684 Direct  
512 892-6652 Fax



**ANALYTICAL REPORT**

**PROJECT NO. SAN JUAN PLANT**

**San Juan Sulfaclean 2**

**Lot #: I7L240134**

RECEIVED  
JAN 17 1998  
OIL CON. DIV.  
EPLS

**Mary Wilson**

**C-K Associates, Inc.**

**QUANTERRA INCORPORATED**

A handwritten signature in cursive script, appearing to read "Carla M. Butler".

**Carla M. Butler**  
Project Manager

**January 9, 1998**

**EXECUTIVE SUMMARY - Detection Highlights**

I7L240134

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING LIMIT</u>	<u>UNITS</u>	<u>ANALYTICAL METHOD</u>
<b>SULFACLEAN 2 12/23/97 08:30 001</b>				
Barium	57.1	20.0	mg/kg	SW846 6010A
Chromium	163	5.0	mg/kg	SW846 6010A
Flashpoint	>150	>150	deg F	SW846 1010
Total Recoverable Petroleum Hydrocarbons	160	10	mg/kg	MCAWW 418.1
pH (solid)	5.9	0.10	No Units	SW846 9045A

**ANALYTICAL METHODS SUMMARY**

I7L240134

<u>PARAMETER</u>	<u>ANALYTICAL METHOD</u>
pH Non-Aqueous	SW846 9045A
Inductively Coupled Plasma (ICP) Metals	SW846 6010A
Mercury in Solid Waste (Manual Cold-Vapor)	SW846 7471
Pensky-Martens Method for Determining Ignitability	SW846 1010
Reactive Cyanide	SW846 7.3.3
Reactive Sulfide	SW846 7.3.4
Total Recoverable Petroleum Hydrocarbons	MCAWW 418.1
TCLP Metals (ICP)	SW846 6010A
Volatile and Gasoline Range Organics (PID/FID)	SW846 8020/GRO

**References:**

- MCAWW "Methods for Chemical Analysis of Water and Wastes",  
EPA-600/4-79-020, March 1983 and subsequent revisions.
- SW846 "Test Methods for Evaluating Solid Waste, Physical/Chemical  
Methods", Third Edition, November 1986 and its updates.

## QC DATA ASSOCIATION SUMMARY

I7L240134

### Sample Preparation and Analysis Control Numbers

<u>SAMPLE#</u>	<u>MATRIX</u>	<u>ANALYTICAL METHOD</u>	<u>LEACH BATCH #</u>	<u>PREP BATCH #</u>	<u>MS RUN#</u>
001	SOLID	SW846 1010		7364156	7364033
	SOLID	MCAWW 418.1		7364177	7364051
	SOLID	SW846 6010A		7363134	7363046
	SOLID	SW846 6010A		8006152	8006040
	SOLID	SW846 6010A	P736503	8006147	8006035
	SOLID	SW846 7471		8005215	8005062
	SOLID	SW846 9045A		7364160	7364036
	SOLID	SW846 7.3.3		7363183	7363060
	SOLID	SW846 7.3.4		7363202	7363076
	SOLID	SW846 8020/GRO		7365174	7365051

## SAMPLE SUMMARY

I7L240134

<u>WO #</u>	<u>SAMPLE#</u>	<u>CLIENT SAMPLE ID</u>	<u>DATE</u>	<u>TIME</u>
CEPAT	001	SULFACLEAN 2	12/23/97	08:30

**NOTE(S) :**

- The analytical results of the samples listed above are presented on the following pages.
- All calculations are performed before rounding to avoid round-off errors in calculated results.
- Results noted as "ND" were not detected at or above the stated limit.
- This report must not be reproduced, except in full, without the written approval of the laboratory.
- Results for the following parameters are never reported on a dry weight basis: color, corrosivity, density, flashpoint, ignitability, layers, odor, paint filter test, pH, porosity pressure, reactivity, redox potential, specific gravity, spot tests, solids, solubility, temperature, viscosity, and weight.

CONOCO NG & GP

Client Sample ID: SULFACLEAN 2

GC Volatiles

**Lot-Sample #....:** I7L240134-001    **Work Order #....:** CEPAT102    **Matrix.....:** SOLID  
**Date Sampled....:** 12/23/97 08:30    **Date Received...:** 12/24/97  
**Prep Date.....:** 12/29/97    **Analysis Date...:** 12/29/97  
**Prep Batch #....:** 7365174    **Analysis Time...:** 21:50  
**Dilution Factor:** 1  
**% Moisture.....:**

PARAMETER	RESULT	REPORTING		
		LIMIT	UNITS	METHOD
Benzene	ND	1.0	ug/kg	SW846 8020/GRO
Toluene	ND	1.0	ug/kg	SW846 8020/GRO
Xylenes (total)	ND	1.0	ug/kg	SW846 8020/GRO
Ethylbenzene	ND	1.0	ug/kg	SW846 8020/GRO
		PERCENT	RECOVERY	
SURROGATE	RECOVERY	LIMITS		
a,a,a-Trifluorotoluene (TFT)	103	(75 - 125)		

CONOCO NG & GP

Client Sample ID: SULFACLEAN 2

General Chemistry

Lot-Sample #....: I7L240134-001    Work Order #....: CEPAT    Matrix.....: SOLID  
 Date Sampled....: 12/23/97 08:30    Date Received...: 12/24/97  
 % Moisture.....:

PARAMETER	RESULT	RL	UNITS	METHOD	PREPARATION- ANALYSIS DATE	PREP BATCH #
pH (solid)	5.9	0.10	No Units	SW846 9045A	12/30/97	7364160
	Dilution Factor: 1 Analysis Time...: 09:30					
Flashpoint	>150	>150	deg F	SW846 1010	12/30/97	7364156
	Dilution Factor: 1 Analysis Time...: 09:00					
Reactive Cyanide	ND	200	mg/kg	SW846 7.3.3	12/29-12/31/97	7363183
	Dilution Factor: 1 Analysis Time...: 09:32					
Reactive Sulfide	ND	200	mg/kg	SW846 7.3.4	12/29/97	7363202
	Dilution Factor: 1 Analysis Time...: 11:00					
Total Recoverable Petroleum Hydrocarbons	160	10	mg/kg	MCAWW 418.1	12/30-01/08/98	7364177
	Dilution Factor: 1 Analysis Time...: 09:00					

CONSTRUCTION & GP

Client Sample ID: SULFACLEAN 2

TCLP Metals

Lot-Sample #...: I7L240134-001 Matrix.....: SOLID  
 Date Sampled...: 12/23/97 08:30 Date Received...: 12/24/97  
 Leach Date.....: 12/29/97 Leach Batch #...: P736503

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD	PREPARATION- ANALYSIS DATE	WORK ORDER #
Prep Batch #...: 8006147						
Chromium	ND	0.50	mg/L	SW846 6010A	01/06-01/07/98	CEPAT10H
		Dilution Factor: 1				
		Analysis Time...: 12:18				

**NOTE(S):**

Analysis performed in accordance with USEPA Toxicity Characteristic Leaching Procedure Method 1311 (55 FR 26986)

Client Sample ID: SULFACLEAN 2

**TOTAL Metals**

Lot-Sample #...: I7L240134-001

Matrix.....: SOLID

Date Sampled...: 12/23/97 08:30 Date Received...: 12/24/97

% Moisture.....:

PARAMETER	RESULT	REPORTING LIMIT	UNITS	METHOD	PREPARATION- ANALYSIS DATE	WORK ORDER #
<b>Prep Batch #...: 7363134</b>						
Cadmium	ND	2.5	mg/kg	SW846 6010A	12/29-12/30/97	CEPAT108
		Dilution Factor: 5				
		Analysis Time...: 17:01				
Total Chromium TCLP CR MD.	163	5.0	mg/kg	SW846 6010A	12/29-12/30/97	CEPAT109
		Dilution Factor: 5				
		Analysis Time...: 17:01				
Silver	ND	5.0	mg/kg	SW846 6010A	12/29-12/30/97	CEPAT10A
		Dilution Factor: 5				
		Analysis Time...: 17:01				
Arsenic	ND	150	mg/kg	SW846 6010A	12/29-12/30/97	CEPAT10C
		Dilution Factor: 5				
		Analysis Time...: 17:01				
Lead	ND	50.0	mg/kg	SW846 6010A	12/29-12/30/97	CEPAT10D
		Dilution Factor: 5				
		Analysis Time...: 17:01				
Selenium	ND	100	mg/kg	SW846 6010A	12/29-12/30/97	CEPAT10E
		Dilution Factor: 5				
		Analysis Time...: 17:01				
<b>Prep Batch #...: 8005215</b>						
Mercury	ND	0.10	mg/kg	SW846 7471	01/05/98	CEPAT10F
		Dilution Factor: 1				
		Analysis Time...: 15:53				
<b>Prep Batch #...: 8006152</b>						
Barium	57.1	20.0	mg/kg	SW846 6010A	01/06-01/08/98	CEPAT207
		Dilution Factor: 1				
		Analysis Time...: 19:17				

**METHOD BLANK REPORT**

**GC Volatiles**

**Client Lot #...**: I7L240134      **Work Order #...**: CEQHX101      **Matrix.....**: SOLID  
**MB Lot-Sample #:** I7L310000-174      **Prep Date.....**: 12/29/97      **Analysis Time...:** 15:04  
**Analysis Date...:** 12/29/97      **Prep Batch #...**: 7365174  
**Dilution Factor:** 1

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING</u>		
		<u>LIMIT</u>	<u>UNITS</u>	<u>METHOD</u>
Benzene	ND	1.0	ug/kg	SW846 8020/GRO
Toluene	ND	1.0	ug/kg	SW846 8020/GRO
Xylenes (total)	ND	1.0	ug/kg	SW846 8020/GRO
Ethylbenzene	ND	1.0	ug/kg	SW846 8020/GRO
<u>SURROGATE</u>	<u>PERCENT RECOVERY</u>	<u>RECOVERY LIMITS</u>		
a, a, a-Trifluorotoluene (TFT)	101	(75 - 125)		

**NOTE(S):**

Calculations are performed before rounding to avoid round-off errors in calculated results.

**METHOD BLANK REPORT**

**TOTAL Metals**

Client Lot #...: I7L240134

Matrix.....: SOLID

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING LIMIT</u>	<u>UNITS</u>	<u>METHOD</u>	<u>PREPARATION- ANALYSIS DATE</u>	<u>WORK ORDER #</u>
<b>MB Lot-Sample #: I7L290000-134 Prep Batch #...: 7363134</b>						
Cadmium	ND	0.50	mg/kg	SW846 6010A	12/29-12/30/97	CEPND107
		Dilution Factor: 1				
		Analysis Time...: 14:31				
Chromium	ND	1.0	mg/kg	SW846 6010A	12/29-12/30/97	CEPND108
		Dilution Factor: 1				
		Analysis Time...: 14:31				
Silver	ND	1.0	mg/kg	SW846 6010A	12/29-12/30/97	CEPND103
		Dilution Factor: 1				
		Analysis Time...: 14:31				
Arsenic	ND	30.0	mg/kg	SW846 6010A	12/29-12/30/97	CEPND104
		Dilution Factor: 1				
		Analysis Time...: 14:31				
Lead	ND	10.0	mg/kg	SW846 6010A	12/29-12/30/97	CEPND101
		Dilution Factor: 1				
		Analysis Time...: 14:31				
Selenium	ND	20.0	mg/kg	SW846 6010A	12/29-12/30/97	CEPND105
		Dilution Factor: 1				
		Analysis Time...: 14:31				
<b>MB Lot-Sample #: I8A060000-152 Prep Batch #...: 8006152</b>						
Barium	ND	20.0	mg/kg	SW846 6010A	01/06-01/08/98	CERC5104
		Dilution Factor: 1				
		Analysis Time...: 18:56				
<b>MB Lot-Sample #: I8A050000-215 Prep Batch #...: 8005215</b>						
Mercury	ND	0.10	mg/kg	SW846 7471	01/05/98	CER4R103
		Dilution Factor: 1				
		Analysis Time...: 15:26				

**NOTE(S):**

Calculations are performed before rounding to avoid round-off errors in calculated results.

**METHOD BLANK REPORT**

**TCLP Metals**

**Client Lot #...: I7L240134**

**Matrix.....: SOLID**

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING LIMIT</u>	<u>UNITS</u>	<u>METHOD</u>	<u>PREPARATION- ANALYSIS DATE</u>	<u>WORK ORDER #</u>
<b>MB Lot-Sample #:</b> I7L310000-147				<b>Prep Batch #...:</b> 8006147		
<b>Leach Date.....:</b> 12/29/97				<b>Leach Batch #...:</b> P736503		
Chromium	ND	0.50	mg/L	SW846 6010A	01/06-01/07/98	CEQE8101

Dilution Factor: 1  
Analysis Time..: 12:14

**NOTE(S):**

Calculations are performed before rounding to avoid round-off errors in calculated results.

## METHOD BLANK REPORT

## General Chemistry

Client Lot #....: I7L240134

Matrix.....: SOLID

<u>PARAMETER</u>	<u>RESULT</u>	<u>REPORTING</u> <u>LIMIT</u>	<u>UNITS</u>	<u>METHOD</u>	<u>PREPARATION-</u> <u>ANALYSIS DATE</u>	<u>PREP</u> <u>BATCH #</u>
Reactive Cyanide	ND	Work Order #: CEPQV101 200	mg/kg	MB Lot-Sample #: SW846 7.3.3	I7L290000-183 12/29-12/31/97	7363183
		Dilution Factor: 1 Analysis Time...: 09:32				
Reactive Sulfide	ND	Work Order #: CEPRP101 200	mg/kg	MB Lot-Sample #: SW846 7.3.4	I7L290000-202 12/29/97	7363202
		Dilution Factor: 1 Analysis Time...: 11:00				
Total Recoverable Petroleum Hydrocarbons	ND	Work Order #: CEQ3M101 10	mg/kg	MB Lot-Sample #: MCAWW 418.1	I7L300000-177 12/30-01/08/98	7364177
		Dilution Factor: 1 Analysis Time...: 09:00				

**NOTE(S):**

Calculations are performed before rounding to avoid round-off errors in calculated results.

**LABORATORY CONTROL SAMPLE EVALUATION REPORT**

**GC Volatiles**

Client Lot #....: I7L240134      Work Order #....: CEQHX102      Matrix.....: SOLID  
 LCS Lot-Sample#: I7L310000-174  
 Prep Date.....: 12/29/97      Analysis Date...: 12/29/97  
 Prep Batch #....: 7365174      Analysis Time...: 13:42  
 Dilution Factor: 1

<u>PARAMETER</u>	<u>PERCENT RECOVERY</u>	<u>RECOVERY LIMITS</u>	<u>METHOD</u>
Benzene	101	(85 - 115)	SW846 8020/GRO
Toluene	101	(85 - 115)	SW846 8020/GRO
Ethylbenzene	100	(85 - 115)	SW846 8020/GRO
Xylenes (total)	101	(85 - 115)	SW846 8020/GRO
Methyl tert-butyl ether	106	(85 - 115)	SW846 8020/GRO
Gasoline Range Organics	106	(85 - 115)	SW846 8020/GRO

<u>SURROGATE</u>	<u>PERCENT RECOVERY</u>	<u>RECOVERY LIMITS</u>
a, a, a-Trifluorotoluene (TFT)	91	(75 - 125)

**NOTE(S):**

Calculations are performed before rounding to avoid round-off errors in calculated results.

## LABORATORY CONTROL SAMPLE EVALUATION REPORT

## TOTAL Metals

Client Lot #....: I7L240134

Matrix.....: SOLID

<u>PARAMETER</u>	<u>PERCENT RECOVERY</u>	<u>RECOVERY LIMITS</u>	<u>METHOD</u>	<u>PREPARATION- ANALYSIS DATE</u>	<u>WORK ORDER #</u>
<b>LCS Lot-Sample#:</b> I7L290000-134 <b>Prep Batch #....:</b> 7363134					
Silver	96	(80 - 120)	SW846 6010A	12/29-12/30/97	CEPND10E
		Dilution Factor: 1			
		Analysis Time..: 14:33			
Arsenic	101	(80 - 120)	SW846 6010A	12/29-12/30/97	CEPND10F
		Dilution Factor: 1			
		Analysis Time..: 14:33			
Selenium	98	(80 - 120)	SW846 6010A	12/29-12/30/97	CEPND10G
		Dilution Factor: 1			
		Analysis Time..: 14:33			
Cadmium	103	(80 - 120)	SW846 6010A	12/29-12/30/97	CEPND10J
		Dilution Factor: 1			
		Analysis Time..: 14:33			
Chromium	114	(80 - 120)	SW846 6010A	12/29-12/30/97	CEPND10K
		Dilution Factor: 1			
		Analysis Time..: 14:33			
Lead	102	(80 - 120)	SW846 6010A	12/29-12/30/97	CEPND102
		Dilution Factor: 1			
		Analysis Time..: 14:33			
<b>LCS Lot-Sample#:</b> I8A050000-215 <b>Prep Batch #....:</b> 8005215					
Mercury	102	(81 - 120)	SW846 7471	01/05/98	CER4R104
		Dilution Factor: 1			
		Analysis Time..: 15:28			
<b>LCS Lot-Sample#:</b> I8A060000-152 <b>Prep Batch #....:</b> 8006152					
Barium	105	(80 - 120)	SW846 6010A	01/06-01/08/98	CERC510C
		Dilution Factor: 1			
		Analysis Time..: 19:01			

**NOTE(S):**

Calculations are performed before rounding to avoid round-off errors in calculated results.

**LABORATORY CONTROL SAMPLE EVALUATION REPORT**

**TCLP Metals**

**Client Lot #...: I7L240134**

**Matrix.....: SOLID**

<u>PARAMETER</u>	<u>PERCENT RECOVERY</u>	<u>RECOVERY LIMITS</u>	<u>METHOD</u>	<u>PREPARATION- ANALYSIS DATE</u>	<u>WORK ORDER #</u>
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<b>LCS Lot-Sample#:</b> I8A060000-147			<b>Prep Batch #...:</b> 8006147		
Chromium	88	(80 - 120)	SW846 6010A	01/06-01/07/98	CERAA101
		Dilution Factor: 1			
		Analysis Time...: 12:16			

**NOTE(S):**

Calculations are performed before rounding to avoid round-off errors in calculated results.

**LABORATORY CONTROL SAMPLE EVALUATION REPORT**

**General Chemistry**

Client Lot #....: I7L240134

Matrix.....: SOLID

<u>PARAMETER</u>	<u>PERCENT RECOVERY</u>	<u>RECOVERY LIMITS</u>	<u>METHOD</u>	<u>PREPARATION- ANALYSIS DATE</u>	<u>PREP BATCH #</u>
pH (solid)	100	Work Order #: CEQ0W101 (90 - 110)	SW846 9045A	LCS Lot-Sample#: I7L300000-160 12/30/97	7364160
		Dilution Factor: 1 Analysis Time...: 09:30			
Flashpoint	101	Work Order #: CEQ0Q101 (95 - 105)	SW846 1010	LCS Lot-Sample#: I7L300000-156 12/30/97	7364156
		Dilution Factor: 1 Analysis Time...: 09:15			
Reactive Cyanide	3.0	Work Order #: CEPQV102 (1.0- 64)	SW846 7.3.3	LCS Lot-Sample#: I7L290000-183 12/29/97	7363183
		Dilution Factor: 1 Analysis Time...: 09:32			
Total Recoverable Petroleum Hydrocarbons	123	Work Order #: CEQ3M102 (70 - 130)	MCAWW 418.1	LCS Lot-Sample#: I7L300000-177 12/30-01/08/98	7364177
		Dilution Factor: 1 Analysis Time...: 09:00			

**NOTE(S):**

Calculations are performed before rounding to avoid round-off errors in calculated results.

**MATRIX SPIKE SAMPLE EVALUATION REPORT**

**GC Volatiles**

Client Lot #....: I7L240134      Work Order #....: CELL3104-MS      Matrix.....: SOLID  
 MS Lot-Sample #: I7L180140-011      CELL3105-MSD  
 Date Sampled...: 12/16/97 09:15      Date Received...: 12/18/97  
 Prep Date.....: 12/29/97      Analysis Date...: 12/29/97  
 Prep Batch #....: 7365174      Analysis Time...: 19:08  
 Dilution Factor: 1      % Moisture.....: 0.0

<u>PARAMETER</u>	<u>PERCENT RECOVERY</u>	<u>RECOVERY LIMITS</u>	<u>RPD</u>	<u>RPD LIMITS</u>	<u>METHOD</u>
Benzene	98	(75 - 125)			SW846 8020/GRO
	93	(75 - 125)	4.6	(0-30)	SW846 8020/GRO
Toluene	97	(75 - 125)			SW846 8020/GRO
	92	(75 - 125)	4.9	(0-30)	SW846 8020/GRO
Ethylbenzene	94	(75 - 125)			SW846 8020/GRO
	89	(75 - 125)	6.2	(0-30)	SW846 8020/GRO
Xylenes (total)	97	(75 - 125)			SW846 8020/GRO
	92	(75 - 125)	5.4	(0-30)	SW846 8020/GRO
Methyl tert-butyl ether	107	(75 - 125)			SW846 8020/GRO
	104	(75 - 125)	3.1	(0-30)	SW846 8020/GRO
Gasoline Range Organics	68 a, MSC	(75 - 125)			SW846 8020/GRO
	62 a	(75 - 125)	9.8	(0-30)	SW846 8020/GRO

<u>SURROGATE</u>	<u>PERCENT RECOVERY</u>	<u>RECOVERY LIMITS</u>
a, a, a-Trifluorotoluene (TFT)	95	(75 - 125)
	94	(75 - 125)

**NOTE(S):**

Calculations are performed before rounding to avoid round-off errors in calculated results.

a Spiked analyte recovery is outside stated control limits.

MSC The percent recovery of this analyte in the associated laboratory control sample is within control limits.

**MATRIX SPIKE SAMPLE EVALUATION REPORT**

**TOTAL Metals**

Client Lot #...: I7L240134

Matrix.....: SOLID

Date Sampled...: 12/29/97 10:30 Date Received...: 01/03/98

PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	RPD	RPD LIMITS	METHOD	PREPARATION- ANALYSIS DATE	WORK ORDER #
<b>MS Lot-Sample #: I7L240125-001 Prep Batch #...: 7363134</b>							
Arsenic	91	(80 - 120)			SW846 6010A	12/29-12/30/97	CEP8L10K
	78 N	(80 - 120)	15	(0-20)	SW846 6010A	12/29-12/30/97	CEP8L10L
			Dilution Factor: 1				
			Analysis Time...: 15:06				
Cadmium	102	(80 - 120)			SW846 6010A	12/29-12/30/97	CEP8L10U
	79 N,*	(80 - 120)	25	(0-20)	SW846 6010A	12/29-12/30/97	CEP8L10V
			Dilution Factor: 1				
			Analysis Time...: 15:06				
Chromium	86	(80 - 120)			SW846 6010A	12/29-12/30/97	CEP8L10W
	81	(80 - 120)	3.0	(0-20)	SW846 6010A	12/29-12/30/97	CEP8L10X
			Dilution Factor: 1				
			Analysis Time...: 15:06				
Lead	86	(80 - 120)			SW846 6010A	12/29-12/30/97	CEP8L10M
	76 N	(80 - 120)	9.7	(0-20)	SW846 6010A	12/29-12/30/97	CEP8L10N
			Dilution Factor: 1				
			Analysis Time...: 15:06				
Selenium	88	(80 - 120)			SW846 6010A	12/29-12/30/97	CEP8L10P
	72 N	(80 - 120)	20	(0-20)	SW846 6010A	12/29-12/30/97	CEP8L10Q
			Dilution Factor: 1				
			Analysis Time...: 15:06				
Silver	89	(80 - 120)			SW846 6010A	12/29-12/30/97	CEP8L10H
	81	(80 - 120)	9.7	(0-20)	SW846 6010A	12/29-12/30/97	CEP8L10J
			Dilution Factor: 1				
			Analysis Time...: 15:06				

**NOTE(S):**

Calculations are performed before rounding to avoid round-off errors in calculated results.

N Spiked analyte recovery is outside stated control limits.

\* Relative percent difference (RPD) is outside stated control limits.

**MATRIX SPIKE SAMPLE EVALUATION REPORT**

**TOTAL Metals**

**Client Lot #...:** I7L240134

**Matrix.....:** SOLID

**Date Sampled...:** 12/29/97 10:30 **Date Received...:** 01/03/98

<u>PARAMETER</u>	<u>PERCENT RECOVERY</u>	<u>RECOVERY LIMITS</u>	<u>RPD</u>	<u>RPD LIMITS</u>	<u>METHOD</u>	<u>PREPARATION- ANALYSIS DATE</u>	<u>WORK ORDER #</u>
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**MS Lot-Sample #:** I8A050105-001 **Prep Batch #...:** 8006152

Barium	92	(80 - 120)			SW846 6010A	01/06-01/08/98	CER1C10J
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	91	(80 - 120)	0.41	(0-20)	SW846 6010A	01/06-01/08/98	CER1C10K
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Dilution Factor: 1

Analysis Time...: 19:33

**NOTE(S):**

Calculations are performed before rounding to avoid round-off errors in calculated results.

**MATRIX SPIKE SAMPLE EVALUATION REPORT**

**TOTAL Metals**

**Client Lot #...:** I7L240134

**Matrix.....:** SOLID

**Date Sampled...:** 12/29/97 10:30 **Date Received...:** 01/03/98

<u>PARAMETER</u>	<u>PERCENT RECOVERY</u>	<u>RECOVERY LIMITS</u>	<u>RPD</u>	<u>RPD LIMITS</u>	<u>METHOD</u>	<u>PREPARATION- ANALYSIS DATE</u>	<u>WORK ORDER #</u>
<b>MS Lot-Sample #:</b> I7L240115-018 <b>Prep Batch #...:</b> 8005215							
Mercury	97	(75 - 125)			SW846 7471	01/05/98	CEP7410G
	89	(75 - 125)	7.0	(0-20)	SW846 7471	01/05/98	CEP7410H

Dilution Factor: 1  
Analysis Time...: 15:33

**NOTE(S):**

Calculations are performed before rounding to avoid round-off errors in calculated results.

**MATRIX SPIKE SAMPLE EVALUATION REPORT**

**TCLP Metals**

**Client Lot #....:** I7L240134

**Matrix.....:** SOLID

**Date Sampled....:** 12/29/97 10:30 **Date Received...:** 01/03/98

<u>PARAMETER</u>	<u>PERCENT RECOVERY</u>	<u>RECOVERY LIMITS</u>	<u>RPD</u>	<u>RPD LIMITS</u>	<u>METHOD</u>	<u>PREPARATION- ANALYSIS DATE</u>	<u>WORK ORDER #</u>
<b>MS Lot-Sample #:</b> I7L240134-001 <b>Prep Batch #....:</b> 8006147							
<b>Leach Date.....:</b> 12/29/97 <b>Leach Batch #...:</b> P736503							
Chromium	83	(80 - 120)			SW846 6010A	01/06-01/07/98	CEPAT10J
	88	(80 - 120)	5.4	(0-20)	SW846 6010A	01/06-01/07/98	CEPAT10K
Dilution Factor: 1							
Analysis Time...: 12:23							

**NOTE(S):**

Calculations are performed before rounding to avoid round-off errors in calculated results.

**MATRIX SPIKE SAMPLE EVALUATION REPORT**

**General Chemistry**

Client Lot #....: I7L240134

Matrix.....: SOLID

Date Sampled...: 12/29/97 10:30 Date Received...: 01/03/98

PARAMETER	PERCENT RECOVERY	RECOVERY LIMITS	RPD	RPD LIMITS	METHOD	PREPARATION- ANALYSIS DATE	PREP BATCH #
Reactive Cyanide			WO#:	CEP7H10A-MS/CEP7H10C-MSD	MS Lot-Sample #:	I7L240118-001	
	0.89 N	(1.0 - 64)			SW846 7.3.3	12/29/97	7363183
	0.87 N	(1.0 - 64)	2.7	(0-213)	SW846 7.3.3	12/29/97	7363183
			Dilution Factor: 1				
			Analysis Time...: 09:32				

Total Recoverable			WO#:	CEQ0C10K-MS/CEQ0C10L-MSD	MS Lot-Sample #:	I7L300104-001	
Petroleum Hydrocarbons							
	60 N	(70 - 130)			MCAWW 418.1	12/30-01/08/98	7364177
	48 N	(70 - 130)	6.5	(0-30)	MCAWW 418.1	12/30-01/08/98	7364177
			Dilution Factor: 1				
			Analysis Time...: 09:00				

**NOTE(S):**

Calculations are performed before rounding to avoid round-off errors in calculated results.

N Spiked analyte recovery is outside stated control limits.

Results and reporting limits have been adjusted for dry weight.

**SAMPLE DUPLICATE EVALUATION REPORT**

**General Chemistry**

Client Lot #....: I7L240134

Work Order #....: CEJTC-SMP  
CEJTC-DUP

Matrix.....: SOLID

Date Sampled....: 12/15/97 10:00 Date Received...: 12/16/97

% Moisture.....: 100

<u>PARAM</u>	<u>RESULT</u>	<u>DUPLICATE</u> <u>RESULT</u>	<u>UNITS</u>	<u>RPD</u> <u>RPD</u>	<u>LIMIT</u>	<u>METHOD</u>	<u>PREPARATION-</u> <u>ANALYSIS DATE</u>	<u>PREP</u> <u>BATCH #</u>
Flashpoint	120	124	deg F	3.3	(0-20)	SD Lot-Sample #: I7L160121-002 SW846 1010	12/30/97	7364156

Dilution Factor: 1  
Analysis Time..: 00:00



Environmental Services

SAMPLE DUPLICATE EVALUATION REPORT

General Chemistry

Client Lot #...: I7L240134

Work Order #...: CEJT8-SMP  
CEJT8-DUP

Matrix.....: SOLID

Date Sampled...: 12/15/97 10:30 Date Received...: 12/16/97

% Moisture.....: 16

PARAM	RESULT	DUPLICATE RESULT	UNITS	RPD	RPD LIMIT	METHOD	PREPARATION- ANALYSIS DATE	PREP BATCH #
pH (solid)	8.0	8.0	No Units	0.25	(0-20)	SD Lot-Sample #: I7L160121-001 SW846 9045A	12/30/97	7364160

Dilution Factor: 1  
Analysis Time...: 00:00

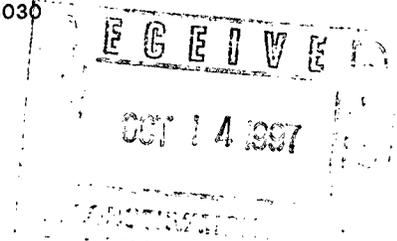






Edward E. Kirk  
Project Engineer - Environmental  
Safety & Environmental Services  
Natural Gas & Gas Products

Conoco Inc.  
600 N. Dairy Ashford  
P.O. Box 2197 - HU 3030  
Houston, TX 77252  
(281) 293-2561



Certified Mail No. P 117 453 015  
Return Receipt Requested

October 7, 1997

Mr. Mark Ashley  
Oil Conservation Division  
Environmental Bureau  
2040 South Pacheco  
Sante Fe, NM 87505

**Re: San Juan Gas Plant Containment of Stormwater Runoff**

Dear Mr. Ashley:

This letter is a follow up to our phone conversation on Oct. 2, 1997 in reference to Conoco's San Juan Plant discharge plan dated May 1996. In section X.C, "Procedures for Containment of Precipitation and Runoff", the plan states that all stormwater will be contained by a dike inside the fence at the south end of the property. Due to concerns that this dike may not be adequate during unusually heavy rainfall we have taken two more steps to ensure that stormwater does not leave the property.

First, a new water catch basin was added just to the northeast of the existing water catch basin. This basin will hold approximately 310,000 gallons of water, and is shown on the enclosed map.

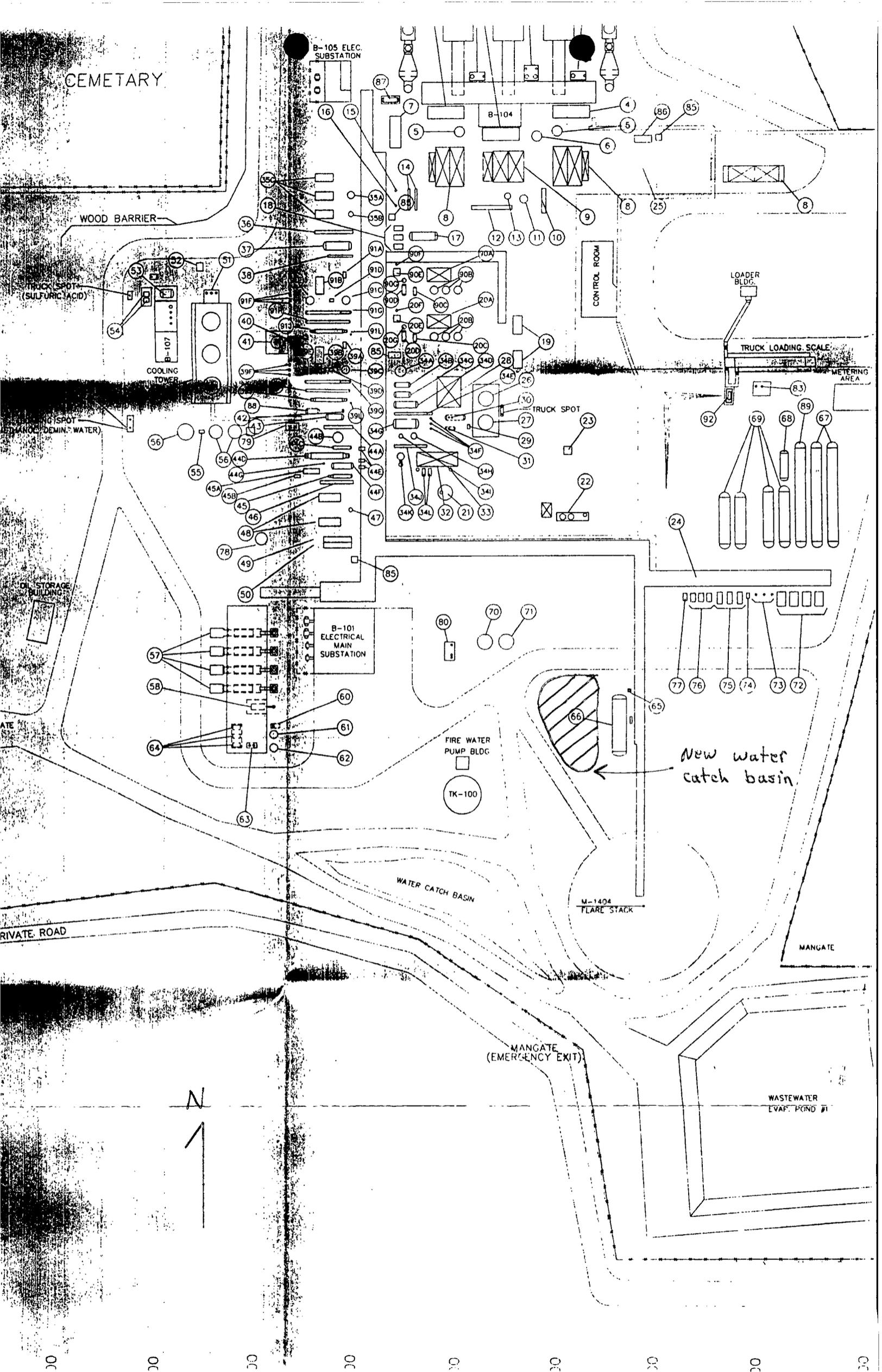
Second, the city of Bloomfield has agreed to accept stormwater runoff from the San Juan Plant for processing at their wastewater treatment plant. The stormwater will be blended with river water and monitored to ensure that it meets the city's requirements for TDS. Delivery of stormwater to Bloomfield's wastewater treatment plant will be a last resort and is expected to be a rare occurrence.

Sincerely,

Ed Kirk

Attachment

cc w/o att: Richard Theander  
Terry Killian  
ENV 215-5-3



CONOCO SAN JUAN GAS PLANT