GW - 42

GENERAL CORRESPONDENCE

YEAR(S):

2007-1984

Chavez, Carl J, EMNRD

To: Chavez, Carl J, EMNRD
Cc: Price, Wayne, EMNRD
Subject: Duke Energy Field Services- Note to File

On January 5 2007, Wayne Price and Carl Chavez of the Oil Conservation Division (OCD) contacted Ruth Lang of Duke Energy Field Services at (303) 605-1713 and left a phone message regarding the large number of expired facilities (see attachment) where the discharge plan was not renewed within 120 or in advance of their expiration. Wayne Price referred to Ms. Lang's December 21, 2006 e-mail message regarding "Duke Energy Field Services Expired Discharge Plan Facilities."

Mr. Price informed Ms. Lang that all discharge plan renewal applications need to be submitted to the OCD for review by March 1, 2007. In addition, she was informed that the OCD will be issuing an Notice of Violation for neglecting to renew its discharge plan permits with the OCD.

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: CarlJChavez@state.nm.us
Website: http//www.emnrd.state.nm.us/ocd/
(Pollution Prevention Guidance is under "Publications")

1/5/2007

Permit ID	Facility	Company	Status	Expired	Contact	phone	e-mail	Comments
150	Pure Gold "28" CS	Duke	A	11/22/03	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
162	Antelope Ridge Gas Plant	Duke	A	3/23/04	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
167	Malaga CS	Duke	A	7/25/04	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
311	Cotton Draw CS	Duke	A	1/6/05	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
316	Hat Mesa CS	Duke	A	1/6/05	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
176	Boot Leg CS	Duke	A	1/20/05	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
227	Lee CS	Duke	I	12/28/05	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Submitted correspondence to Ben Stone during meeting in Sept. 2006
168	Feagen Booster Station	Duke	I	12/27/04	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Closed 2/1/05
177	Maljamar CS	Duke	A	3/21/05	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
178	Wonton CS	Duke	A	3/21/05	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
24	Avalon Gas Plant	Duke	A	9/18/05	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
163	Apex CS	Duke	A	4/29/04	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
175	Hobbs Gas Process Plant	Duke	A	1/9/05	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
16	Eunice Gas Plant	Duke	A	4/25/09	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Request 120 day extension to 4/1/07
139	CP-1 CS	Duke	A	3/23/04	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Closed 10/15/03
142	Indian Hills Gas Plant	Duke	I	4/6/2002	Lisabeth Klein	303-605-1778	eaklein@duke-energy.com	Dismantled

Duke Energy Field Services
A New Kind of Energy™

Duke Energy Field Services
P.O. Box 5493
Denver, Colorado 80217
370 17th Street, Suite 900
Denver, Colorado 80202
303/595-3331

December 10, 2001

CERTIFIED MAIL
RETURN RECEIPT

Mr. Jack Ford
New Mexico Energy, Minerals
& Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87504

SUBJECT: Indian Hills Compressor Station
Discharge Plan No. GW-042
Eddy County, New Mexico

Dear Mr. Ford:

Duke Energy Field Services, LP (DEFS) has dismantled the Indian Hills Compressor Station located in NW/4 SW/4, T 21S, R 25E, Section 13 in Eddy County. DEFS currently operates only a pig launcher and metering station facility on that site. There are no discharges from the facility that may move directly or indirectly into groundwater. Therefore, DEFS does not intend to renew Discharge Plan GW-042.

If you have any questions regarding this facility, please call me at (303) 605-1717.

Sincerely,
Duke Energy Field Services, LP

Karin Char
Environmental Specialist

NEW MEXICO ENERGY, MINERALS and
NATURAL RESOURCES DEPARTMENT

GARY E. JOHNSON
Governor
Jennifer A. Salisbury
Cabinet Secretary

Lori Wrotenbery
Director
Oil Conservation Division

October 16, 2001

CERTIFIED MAIL
RETURN RECEIPT NO. 5051 0869

Ms. Karin Char
Duke Energy Field Services, LLC
370 Seventeenth Street, Suite 900
Denver, Colorado 80202

RE: Discharge Plan Renewal Notice for Duke Energy Field Services, LLC Facility

Dear Ms. Char:

The OCD is providing Duke Energy Field Services, LLC a six months notice that the following discharge plan which expires.

GW-042 expires 4/6/2002 – Indian Hills Compressor Station

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]

The discharge plan renewal application for each of the above facilities is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan renewal will be assessed a fee equal to the filing fee of $100.00 plus a flat fee based upon the horsepower rating for gas processing facilities. The $100.00 filing fees is are be submitted with the discharge plan renewal applications and are nonrefundable.

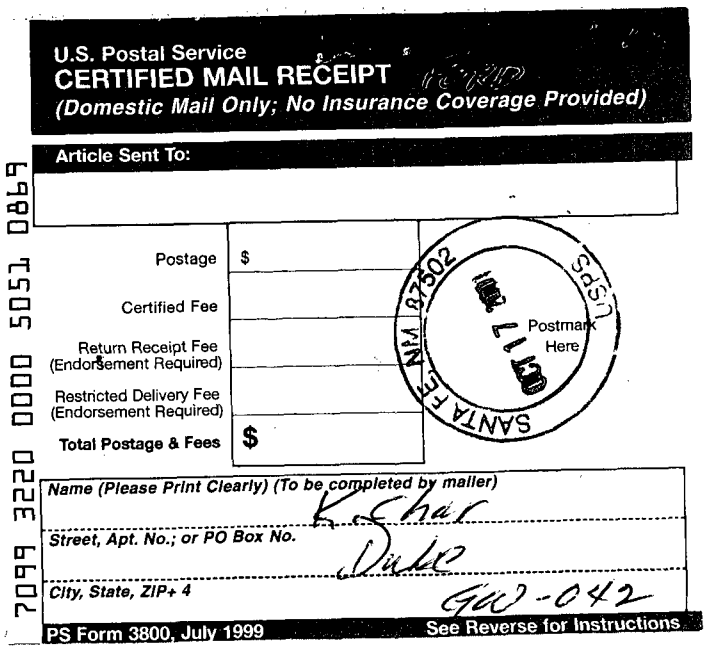
Please make all checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office. Please submit the original discharge plan renewal application and one copy to the OCD Santa Fe Office and one copy to the OCD Hobbs District Office. **Note that the completed and signed application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

If any of the above sited facilities no longer has any actual or potential discharges and a discharge plan is not needed, please notify this office. If the Duke Energy Field Services, LLC has any questions, please do not hesitate to contact Mr. W. Jack Ford at (505) 476-3489.

Sincerely,

Roger C. Anderson
Oil Conservation Division

cc: OCD Hobbs District Office



FULBRIGHT & JAWORSKI L.L.P.
A REGISTERED LIMITED LIABILITY PARTNERSHIP
1301 MCKINNEY, SUITE 5100
HOUSTON, TEXAS 77010-3095

TELEPHONE: 713/651-5151
FACSIMILE: 713/651-5246

WRITERS INTERNET ADDRESS:
elewis@fulbright.com

WRITER'S DIRECT DIAL NUMBER:
713/651-3760

HOUSTON
WASHINGTON, D.C.
AUSTIN
SAN ANTONIO
DALLAS
NEW YORK
LOS ANGELES
MINNEAPOLIS
LONDON
HONG KONG

January 15, 2001

Re: Notification of Name Change to Duke Energy Field Services, LP

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

Dear Mr. Anderson:

In a February 16, 2000 letter addressed to you from Mel Driver of GPM Gas Company, LLC, Mr. Driver informed you that GPM Gas Company, LLC and Duke Energy Field Services, LLC were planning to undergo an internal corporate reorganization later in the year. As a result of this corporate reorganization, which has now taken place, facilities that were formerly operated under the name of GPM Gas Company, LLC are now being operated under the name of Duke Energy Field Services, LP. A chart that lists facilities with New Mexico Oil Conservation Division permits that are affected by this change is enclosed with this letter. Please update your records to reflect Duke Energy Field Services, LP as the permit holder for the facilities listed on the enclosed chart.

Thank you for your assistance, and please feel free to call me at (713) 651-3760 if you have any questions.

Very truly yours,

Eddie Lewis

Edward C. Lewis

ECL/jnr

5589827.1

cc: Ms. Nelda Morgan
New Mexico Oil Conservation Division
1625 North French Drive
Hobbs, New Mexico 88240

Ms. Vicki Gunter
Duke Energy Field Services, LP
P. O. Box 50020
Midland, Texas 79710

FACILITY NAME	PERMIT NUMBER	CURRENT NAME	NEAREST CITY
Artesia Plant	GW-168	GPM Gas Company, LLC	Artesia
Avalon Plant	GW-024	GPM Gas Company, LLC	Carlsbad
Eunice Plane	GW-009	GPM Gas Company, LLC	Eunice
Feagen	GW-168	GPM Gas Company, LLC	Artesia
Hat Mesa	GW-128	GPM Gas Company, LLC	Hobbs
Hobbs	GW-044	GPM Gas Company, LLC	Hobbs
Indian Hills	GW-042	GPM Gas Company, LLC	Carlsbad ✓
Lee Plant	GW-002	GPM Gas Company, LLC	Lovington
Linam Ranch Plant	GW-015	GPM Gas Company, LLC	Hobbs
Maljamar	GW-177	GPM Gas Company, LLC	Lovington
Sand Dunes	GW-142	GPM Gas Company, LLC	Loving
Won Ton	GW-178	GPM Gas Company, LLC	Lovington
Zia Plant	GW-145	GPM Gas Company, LLC	Maljamar

GPM GAS CORPORATION

3300 N "A" ST. BLDG 7
MIDLAND, TX 79705-5421

MAILING ADDRESS
P.O. BOX 50020
MIDLAND, TX 79710-0020

February 16, 2000

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

Subject: Notification of Name Change to **GPM Gas Company, LLC**

Dear Mr. Anderson:

This letter is to notify you that on February 1, 2000, GPM Gas Corporation underwent a **name change**. The name of the company is now **GPM Gas Company, LLC**. This name change relates to a change in corporate status which occurred in anticipation of the expected merger between GPM and a unit of Duke Energy. GPM and Duke currently expect that, if all necessary regulatory approvals are obtained, the merger should be completed in April of this year.

Submitted with this letter is a listing of all environmental permits that are affected by this name change. Please take the actions necessary to reflect this name change on your records.

As a matter of general information, we wanted also to advise you of the possibility of a further name change in the coming months. In connection with the expected merger, it is possible that a further change in name or in corporate status could take place. We will advise you of any future changes that occur.

We appreciate your assistance in this matter.

GPM Gas Company, LLC

Mel P. Driver

Mel P. Driver
Environmental Engineer
New Mexico Region

Attachment

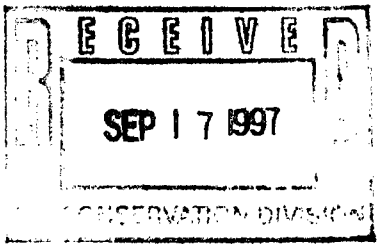
Facility Name	Permit Number	Expiration Date	Issued by	Held by	Nearest City
Artesia Plant	GW-168	7/1/00	NMED OCD	GPM Gas Corporation	Artesia
Avalon Plant	GW-024	9/1/00	NMED OCD	GPM Gas Corporation	Carlsbad
Eunice Plant	GW-009	4/1/04	NMED OCD	GPM Gas Corporation	Eunice
Feagen	GW-168	12/1/99	NMED OCD	GPM Gas Corporation	Artesia
Hat Mesa	GW-128	11/1/02	NMED OCD	GPM Gas Corporation	Hobbs
Hobbs	GW-044	12/1/02	NMED OCD	GPM Gas Corporation	Hobbs
Indian Hills	GW-042	4/1/02	NMED OCD	GPM Gas Corporation	Carlsbad
Lee Plant	GW-002	3/1/01	NMED OCD	GPM Gas Corporation	Lovington
Linam Ranch Plant	GW-015	4/1/04	NMED OCD	GPM Gas Corporation	Hobbs
Maljamar	GW-177	3/1/00	NMED OCD	GPM Gas Corporation	Lovington
Sand Dunes	GW-142	5/1/03	NMED OCD	GPM Gas Corporation	Loving
Won Ton	GW-178	3/1/00	NMED OCD	GPM Gas Corporation	Lovington
Zia Plant	GW-145	7/1/03	NMED OCD	GPM Gas Corporation	Maljamar

Semptember 14, 1997

GPM GAS SERVICES COMPANY
A DIVISION OF PHILLIPS PETROLEUM COMPANY

4044 PENBROOK
ODESSA, TX 79762

Indian Hills Gas Plant
Discharge Plan GW-042
Discharge Plan Renewal



Mr. Patricio Sanchez, Petroleum Engineer
State of New Mexico
Energy, Minerals & Natural Resources Department
Oil Conservation Division, Environmental Bureau
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Dear Mr. Sanchez:

Pursuant to Title 20 New Mexico Administrative Code (NMAC) 6.2, Subpart III, Section 3106, Application for Discharge Plan Approvals and Renewals, GPM Gas Services Company (GPM) is herewith submitting the required flat fee along with the signed discharge plan Requirements Acceptance Agreement for Indian Hills Gas Plant.

Discharge Plan GW-042 was initially approved and issued to Gas Company of New Mexico (GCNM) July 20, 1987, and renewed to GCNM July 20, 1992. Williams Field Services acquired Indian Hills Gas Plant from GCNM June 30, 1995, and GPM acquired the Plant from William Field Services on the same date or June 30, 1995. GPM ceased operations at Indian Hills Gas Plant July 1, 1995, and the Plant's current status is temporarily shut-in.

GPM is of the opinion GCNM operated Indian Hills Gas Plant in accordance with the terms and conditions of Groundwater Discharge Plan GW-042. GPM also is of the opinion no significant process modifications, changes in discharge water quality, or discharge volume occurred at the Plant while operated by GCNM. GPM has made no changes to Indian Hills Gas Plant since acquisition on June 30, 1995.

Please do not hesitate to contact me at (915) 368-1142 should you have any questions or require additional information. Thank you.

Sincerely,

Mel P. Driver

Mel P. Driver, P.E.
Environmental Engineer
New Mexico Region

United States Department of the Interior

FISH AND WILDLIFE SERVICE
New Mexico Ecological Services Field Office
2105 Osuna NE
Albuquerque, New Mexico 87113
Phone: (505) 761-4525 Fax: (505) 761-4542

May 30, 1997

William J. Lemay, Director
Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

Dear Mr. Lemay:

This responds to your agency's public notices dated April 29, 1997, and May 6, 1997, regarding the discharge plan renewal applications for the three applicants described below:

(GW-126) - Weatherford Enterra US. Ms. Lesa Griffin has submitted an application for renewal of the company's approved discharge plan for the Farmington facility located in Section 19, Township 29 North, Range 12 West, San Juan County, New Mexico. Discharges will be stored in a closed-top receptacle.

(GW-054) - Conoco, Inc. Ms. Terry L. Killian has submitted an application for renewal of the company's approved discharge plan for the "Wingate" gas plant located in Sections 9, 10, 15, 16, and 17, Township 15 North, Range 17 West, McKinley County, New Mexico. Discharges of plant waste water are stored and disposed of in two evaporation ponds.

GW-042) - GPM Gas Services Company. Mr. Scott Seeby has submitted an application for renewal of the company's approved discharge plan for the Indian Hill Gas Plant located in Section 13, Township 21 South, Range 25 East, Eddy County, New Mexico. The facility is currently inactive with no discharges occurring.

The U.S. Fish and Wildlife Service (Service) heartily approves of discharge plans that utilize closed top receptacles or tanks (i.e., Discharge Plan GW -126). The installation of berms around these structures is also recommended to help prevent any contamination of the surface waters of New Mexico in the event that a tank or receptacle is accidentally ruptured.

The Service recommends the use of wildlife exclusion technology (nets, fences, enclosed tanks, etc.) to prevent migratory bird and other wildlife access to any brine or produced water storage ponds, lined or unlined evaporative ponds, open tanks, or lagoons that contain toxic chemicals, or that may harbor a surface oil sheen. During flight, migratory birds may not distinguish between an evaporation or storage pond and a natural water body: the artificial water body may serve as an "attractive nuisance" if measures are not taken to exclude migratory birds from access. Alternatively, the applicant may demonstrate that the retained waters are "bird-safe" (e.g., can meet New Mexico general water quality standards 1102.B, 1102.F, and 3101.K or 3101.L).

If the construction and operation of such structures results in migratory bird deaths and the problem is not addressed, the operator may be held liable under the enforcement provisions of the Migratory Bird Treaty Act (MBTA). Under the MBTA, the courts have held that an operator of process waste water storage facilities may be held liable for an "illegal take" of migratory birds. An "illegal take" has been interpreted to include accidental poisoning or accumulation of harmful concentrations of contaminants by migratory birds, which might occur as a result of access to the stored water. Hydrocarbon pollutants, for instance, can be carried to the nest on breast feathers, feet, or in nesting materials, where the eggs can subsequently become contaminated, leading to embryo death and reduced hatchability.

Our intent is to inform and intercede before any migratory bird deaths occur, since these birds constitute a legally protected resource. The Service would rather prevent a problem resulting from migratory bird access to contaminated ponds than take enforcement actions, which are expensive and disruptive to legitimate mineral extraction and energy production activities.

Thank you for the opportunity to review and comment on this discharge plan application. If you have any questions about these comments, please contact Dennis Byrnes at (505) 761-4525.

Sincerely,

Jennifer Fowler-Propst
Field Supervisor

cc:
Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico
Geographic Manager, New Mexico Ecosystems, U.S. Fish and Wildlife Service, Albuquerque, New Mexico
Senior Resident Agent, U.S. Fish and Wildlife Service, Albuquerque, New Mexico
Migratory Bird Office, U.S. Fish and Wildlife Service, Albuquerque, New Mexico

Affidavit of Publication

No. 15842

STATE OF NEW MEXICO,

County of Eddy:

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

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

First Publication May 13, 1997

Second Publication

Third Publication

Fourth Publication

Gary D. Scott

Subscribed and sworn to before me this 22nd day of May 1997

Barbara Ann Baca
Notary Public, Eddy County, New Mexico

My Commission expires September 23, 1999

Copy of Publication

5-31-97
okay DRB

RECEIVED

MAY 30 1997

Environmental Bureau
Oil Conservation Division

LEGAL NOTICE

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

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

(GW-042) - GPM Gas Services Company, Mr. Scott Seeby, (915)-368-1142, 4044 Penbrook, Odessa, TX 79762 has submitted a Discharge Plan Renewal Application for their Indian Hills Gas Plant located in the NW/4 SW/4, Section 13, Township 21 South, Range 25 East, NMPM, Eddy County, New Mexico. The facility is currently inactive or temporally shutdown. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 180 feet with a total dissolved solids concentration of approximately 3,000 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.
Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan renewal application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of the publication of this notice during which comments may be submitted to him and a public hearing may be rquested by any interested person. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest. If no public hearing is held, the Director will approve or disapprove the proposed plan renewal based on information available. If a public hearing is held, the director will approve or disapprove the proposed plan renewal based on information in the discharge plan application and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 6th day of May, 1997.

STATE OF NEW MEXICO
OIL CONSERVATION
DIVISION
s-William J. LeMay
WILLIAM J. LEMAY
Director

SEAL

Published in the Artesia Daily Press, Artesia, N.M. May 13, 1997.

Legal 15842

The Santa Fe New Mexican

Since 1849. We Read You.

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

AD NUMBER: 638069 ACCOUNT: 56689

LEGAL NO: 61695 P.O. #: 96-199-002997

RECEIVED
MAY 13 1997
CONSERVATION DIVISION

165 LINES ONCE at $ 66.00

Affidavits: 5.25

Tax: 4.45

Total: $ 75.70

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, BETSY PERNER being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily news paper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication # 61695 a copy of which is hereto attached was published in said newspaper once each WEEK for ONE consecutive week(s) and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 12 day of MAY 1997 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/ Betsy Perner
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 12 day of MAY A.D., 1997

Notary Candace C. Ruiz
Commission Expires

OFFICIAL SEAL
Candace C. Ruiz
NOTARY PUBLIC
STATE OF NEW MEXICO
My Commission Expires: 4/10/99

RECEIVED
MAY 14 1997
Environmental Bureau
Oil Conservation Division

Okay
5-14-97

NOTICE OF PUBLICATION

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 6th day of May 1997.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
WILLIAM J. LEMAY,
Director
~~Legal~~ #61695
Pub. May 12, 1997

NOTICE OF PUBLICATION

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

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 6th day of May, 1997.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

William J. LeMay /by RCA

S E A L

WILLIAM J. LEMAY, Director

WJL/RCA/pws

May 1, 1997

GPM GAS SERVICES COMPANY
A DIVISION OF PHILLIPS PETROLEUM COMPANY

4044 PENBROOK
ODESSA, TX 79762

Indian Hills Gas Plant
Discharge Plan GW-042
Discharge Plan Renewal

Mr. Patricio Sanchez, Petroleum Engineer
State of New Mexico
Energy, Minerals & Natural Resources Department
Oil Conservation Division, Environmental Bureau
2040 South Pacheco Street
Santa Fe, New Mexico 87505

Dear Mr. Sanchez:

Pursuant to Title 20 New Mexico Administrative Code (NMAC) 6.2, Subpart III, Section 3106, Application for Discharge Plan Approvals and Renewals, GPM Gas Services Company (GPM) requests renewal of Groundwater Discharge Plan GW-042, Indian Hills Gas Plant. Please find enclosed a completed Discharge Plan Application and $50.00 renewal filing fee as required of Title 20 NMAC 6.2.

Discharge Plan GW-042 was initially approved and issued to Gas Company of New Mexico (GCNM) July 20, 1987, and renewed to GCNM July 20, 1992. Williams Field Services acquired Indian Hills Gas Plant from GCNM June 30, 1995, and GPM acquired the Plant from William Field Services on the same date or June 30, 1995. GPM ceased operations at Indian Hills Gas Plant July 1, 1995, and the Plant's current status is temporarily shut-in.

GPM is of the opinion GCNM operated Indian Hills Gas Plant in accordance with the terms and conditions of Groundwater Discharge Plan GW-042. GPM also is of the opinion no significant process modifications, changes in discharge water quality, or discharge volume occurred at the Plant while operated by GCNM. GPM has made no changes to Indian Hills Gas Plant since acquisition on June 30, 1995.

Please do not hesitate to contact me at (915) 368-1142 should you have any questions or require additional information. Thank you.

Sincerely,

Scott Seeby
Environmental Engineer
New Mexico Region

District I - (505) 393-6161
P. O. Box 1980
Hobbs, NM 88241-1980
District II - (505) 748-1283
811 S. First
Artesia, NM 88210
District III - (505) 334-6178
1000 Rio Brazos Road
Aztec, NM 87410
District IV - (505) 827-7131

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

Revised 12/1/9

Submit Origin.
Plus 1 Copi
to Santa I
1 Copy to appropria
District Offi

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

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

☐ New ☒ Renewal ☐ Modification

1. Type: Gas Plant (Indian Hills Gas Plant)

RECEIVED
MAY - 6 1997
Environmental Bureau
Oil Conservation Division

2. Operator: GPM Gas Services Company

Address: 4044 Penbrook, Odessa, TX 79762

Contact Person: Mel Driver Phone: (915) 368-1142

3. Location: NW /4 SW /4 Section 13 Township 21 Range 25
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 herby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

NAME: Scott J. Seeby Title: Environmental Engineer

Signature: Scott J. Seeby Date: May 1, 1997

GPM Gas Corporation
Indian Hills Gas Plant Discharge Plan Renewal
Addendum to Discharge Plan Application
Response to Questions 4. through 13.

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

Response:

Commissioner of Public Lands
New Mexico State Land Office
P.O. Box 1148
Santa Fe, New Mexico 87504-1148
(505) 827-5728

Commissioner of Public Lands
New Mexico State Land Office
310 Old Santa Fe Trail
Santa Fe, New Mexico 87504
(505) 827-5728

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

Response: Please see original Indian Hills Gas Plant Discharge Plan Application filed with the Oil Conservation Division (OCD) May 19, 1987, and approved July 20, 1987. Also please see the Indian Hills Gas Plant renewal Discharge Plan Application filed with the OCD February 11, 1992, and approved April 6, 1992. Additionally, please see the attached Indian Hills Gas Plant Spill Prevention Control and Countermeasure (SPCC) Plan completed June 29, 1995.

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

Please see original Indian Hills Gas Plant Discharge Plan Application filed with the OCD May 19, 1987, and approved July 20, 1987. Also please see the Indian Hills Gas Plant renewal Discharge Plan Application filed with the OCD February 11, 1992, and approved April 6, 1992. Additionally, please see the attached Indian Hills Gas Plant SPCC Plan completed June 29, 1995.

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

Please see original Indian Hills Gas Plant Discharge Plan Application filed with the OCD May 19, 1987, and approved July 20, 1987. Also please see the Indian Hills Gas Plant renewal Discharge Plan Application filed with the OCD February 11, 1992, and approved April 6, 1992.

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

Please see original Indian Hills Gas Plant Discharge Plan Application filed with the OCD May 19, 1987, and approved July 20, 1987.

Also please see the Indian Hills Gas Plant renewal Discharge Plan Application filed with the OCD February 11, 1992, and approved April 6, 1992. Additionally, please see the attached Indian Hills Gas Plant SPCC Plan completed June 29, 1995.

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

There are no proposed modifications to existing collection/treatment/disposal systems.

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

Please see original Indian Hills Gas Plant Discharge Plan Application filed with the OCD May 19, 1987, and approved July 20, 1987. Also please see the Indian Hills Gas Plant renewal Discharge Plan Application filed with the OCD February 11, 1992, and approved April 6, 1992. Additionally, please see the attached Indian Hills Gas Plant SPCC Plan completed June 29, 1995.

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

Please see original Indian Hills Gas Plant Discharge Plan Application filed with the OCD May 19, 1987, and approved July 20, 1987. Also please see the Indian Hills Gas Plant renewal Discharge Plan Application filed with the OCD February 11, 1992, and approved April 6, 1992. Additionally, please see the attached Indian Hills Gas Plant SPCC Plan completed June 29, 1995.

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

Please see original Indian Hills Gas Plant Discharge Plan Application filed with the OCD May 19, 1987, and approved July 20, 1987. Also please see the Indian Hills Gas Plant renewal Discharge Plan Application filed with the OCD February 11, 1992, and approved April 6, 1992.

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

The Indian Hills Gas Plant will be closed in accordance with Title 20 New Mexico Administrative Code 6.2, Subpart III, Section 3107, Subsection A11.

SPCC Plan

If there has been a spill, refer immediately to section 6 for response and clean-up procedures

Facility

Indian Hills Purification Plant
Gas Company of New Mexico
Bob Bogan, Plant Manager
(505) 885-6110

Location of Facility

NW 1/4 of SW 1/4 of Section 13, Township 21 South,
Range 25 East
Eddy County, NM

Legally Responsible Party

Public Service Company of New Mexico
Alvarado Square
Albuquerque, New Mexico 87158-0900
Attn: John Renner
Vice President, Gas Supply Sourcing
Gas Company of New Mexico
(505) 632-3311

This plan documents the procedures, methods, and equipment to prevent the discharge of oil from this facility into or upon the waterways of the United States. It was prepared in accordance with EPA regulations at 40 CFR Part 112. Sections 1 through 6 of the plan describe the facility, the potential for spills, and in-place spill prevention and control measures. Sections 7, 8, and 9 describe the inspection, training, and security procedures required to maintain the plan.

Certification of the Applicability of the Substantial Harm Criteria

(required by 40 CFR 112.20 (e))

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

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

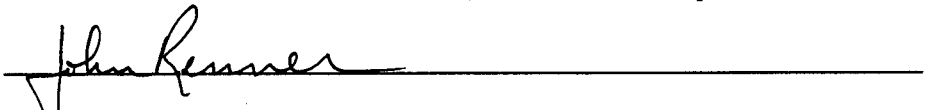
3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to Appendix C to Part 112 or a comparable formula) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? **No**

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated the appropriate formula in Attachment C-III to Appendix C to Part 112 or a comparable formula) such that a discharge from the facility would shut down a public drinking water intake? **No**

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experience a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years? **No**

Certification

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

Signed 

Name John Renner

Title Vice President Gas Supply Sourcing

Company Gas Company of New Mexico

Date June 29, 1995

Certification by Professional Engineer

(required by 40 CFR 112.3(e))

I hereby certify that the Indian Hills Purification Plant located in Eddy County, New Mexico, has been inspected under my supervision and being familiar with the provisions of 40 CFR Part 112, attest that this SPCC Plan has been prepared in accordance with good engineering practices. This certification does not apply to the structural integrity of the containments.

Gary L Richardson — 5-18-95

Signature — Date

Gary L. Richardson, P.E.
New Mexico Registration Number 6436

Contents

List of Appendices

Section 1
Introduction

This Spill Prevention Control and Countermeasure (SPCC) Plan was prepared by Public Service Company of New Mexico (PNM) for the Indian Hills Purification Plant which is owned and operated by Gas Company of New Mexico (GCNM). At the time this plan was being prepared, this plant was due to be sold by fall 1995. The Indian Hills plant is operated for the removal of hydrogen sulfide from field natural gas.

Preparation of this plan was performed following Environmental Protection Agency (EPA) regulations found at 40 CFR part 112 and the *SPCC Manual* published by EPA Region VI. A copy of the SPCC regulations followed for the development of this plan are located in appendix 6. For the purposes of the SPCC regulations, the term "oil" includes petroleum, gasoline, diesel fuel, fuel oil, sludge, oil refuse and oil mixed with wastes. Based upon conversations with EPA staff members at Regions 6 and 9, oil also includes the following substances which are typically found at natural gas processing plants and compressor stations: drip/condensate, natural gas liquids, and natural gasoline . Oil does not include hydrocarbon-based substances such as Y-Grade product, propane, ethane, methane, and butane which volatilize immediately or shortly after reaching ambient temperature and pressure.

An SPCC Plan is intended to protect the waters of the US from unintentional discharges of large volumes of oil. The facility owner understands that spills which have the potential to reach even the smallest drainage channel also have the potential to end up in a navigable waterway. Therefore, the facility owner will put forth its best effort to protect human health and the environment from any harmful effects which might result from an unintentional discharge of oil from the Indian Hills Purification Plant

A complete and up-to-date copy of the SPCC Plan will be maintained at the plant office. The facility owner will review this plan once every three years. However, in the event of major equipment changes at the facility, the plan will be reviewed and edited according to those changes that affect the SPCC Plan.

Potential discharges of oil and hazardous materials to the waters of New Mexico are regulated at the State level by New Mexico's Oil Conservation Division (OCD). The plant currently operates under Ground Water Discharge Plan GW-42 which expires in April 1997.

Section 2
Facility Description

The facility was constructed in the early 1960s. This facility transforms sour natural gas to sweet natural gas by using a regenerative diethanolamine process to remove hydrogen sulfide and carbon dioxide from natural gas. The process takes place using scrubbers, flash tanks, pumps, charcoal beds, exchangers, surge tanks, and a flare. Maximum throughput at the plant is 30 MMCFD of natural gas.

The facility encompasses 9.6 acres and is located in the southeast portion of New Mexico. The facility is approximately five miles north of Carlsbad, New Mexico. It is located on level terrain in an area known as Adobe Flat. The facility is located approximately 5571 feet above mean sea level. The facility is indicated on the Carlsbad West, New Mexico 7.5 minute topographic map in appendix 1.

This section describes the facility's drainage systems, oil-containing bulk storage tanks and process vessels, internal facility transfer and piping systems, and tank truck transfer operations. A facility diagram is included in appendix 1. Process flow diagrams are located in appendix 2.

2.1 Facility Drainage

The facility is not equipped with a closed drainage system. The Indian Hills plant is located in a flat valley. Therefore, run-off from the facility is slow and often collects in some areas of the plant. Storm water from the northeast portion of the facility is diverted by a berm around the process area and directed toward natural drainage patterns to the northwest.

Run-off from the facility flows to the northwest toward Spencer Draw which is located approximately 2000 feet west of the plant.

2.2 Bulk Storage Tanks

SPCC regulations define a bulk storage tank as "any container used to store oil... for purposes including, but not limited to, the storage of oil prior to use, while being used, or prior to further distribution in commerce." Therefore, based upon this definition, the spill potential from facility process vessels are also included in storage tank discussions.

The plant has a potential above ground oil storage tank capacity totaling 144,435 gallons. This total does not include the capacities of process vessels which utilize and contain oils. Daily throughput and storage amounts for the process vessels vary according to inlet processes.

A facility tank table is located in appendix 3. This table identifies all tanks at the facility, their capacity, secondary containment devices, direction of flow in the event of a spill, and tank construction material. The numbers located to the left of the storage tank contents correspond to the tank numbers on the facility diagram in appendix 1. The table also identifies which tanks at the facility contain oil as defined in section 1.

The following vessels utilized at the plant have the potential to unintentionally discharge oil.

- contactor scrubber
- tail scrubber
- inlet gas filter separator cases
- pig receiver

In the event of a spill or leak, drainage from these vessels would flow into existing plant drainage patterns discussed in section 2.1.

2.3 Facility Transfer Operations, Pumping, and In-Plant Process Piping

Facility transfer operations involve piping, valves, gauges, regulators, compressors, pumps, and other mechanical devices used to transfer oil from one area to another within the facility. Pipelines transporting gas into and out of the facility are not covered by the SPCC regulations.

Motor oil is utilized at the plant to lubricate the amine pumps. Approximately three 55-gallon drums of motor oil are stored on site on a concrete pad. Waste oil from the pumps is drained to the diethanolamine (DEA) and oil tank which drains into the 8,820-gallon miscellaneous liquids tank. Approximately 55-gallons per month of oil are used for the amine pumps.

Underground and above ground pipelines are utilized for oil transfers between process vessels and storage tanks. Underground oil transfer pipelines operate at atmospheric pressure, except for the lines to the 90,000-gallon drip/condensate tank. Those lines operate at 200 psi.

2.4 Tank Truck Transfer Operations

The feedstock for the plant - natural gas - is transported to the plant via pipeline. The facility is not served by rail lines or water ports. Most transfers of SPCC-regulated materials to and from the facility are accomplished via tanker truck. The following tanker truck transfer operations typically occur at the facility. The three 8,820-gallon drip/condensate tanks, the 8,820-gallon temporary storage tanks, the 8,820-gallon

miscellaneous liquids tank, the 321-gallon waste water tank, and the 8,820-gallon waste water tank are emptied as needed.

Section 3
Site Spill Potential

This section projects the potential types, amounts, and locations of spills that could occur at the facility.

3.1 Potential Spill Events

Listed below are the typical categories of potential spill events that could occur at the facility due to equipment failure. They include the worst-case instances of failure for the largest oil container at the facility. However, several other unpredictable factors might occur during a spill event that would cause more than one potential failure to occur at once. Such factors may cause the potential spill volumes or rates to be much higher than the ones listed below. The facility owner is aware of such a possibility, and is prepared to act accordingly. The following table was adapted from an undated EPA sample SPCC Plan. Italicized items were changed to reflect the capacity of the facility.

Potential Event	Volume Released	Spill Rate
Complete failure of a full tank	*Up to 90,000 gallons*	Instantaneous
Partial failure of a full tank	*1 to 89,999 gallons*	Gradual to instantaneous
Tank overfill	1 to several gallons	Up to 1 gallon per minute
Pipe failure	*Up to 90,000 gallons*	4 gallons per second
Leaking pipe or valve packing	Several ounces to several gallons	Up to 1 gallon per minute
Leak during truck loading or unloading	1 to several gallons	Up to 1 gallon per minute

Probable flow directions in the event of spills or leaks from storage tanks are listed in the tank table in appendix 3.

Typically in all types of plant facilities, connection points between equipment have the highest possibility of unintentionally releasing material. If a spill event were to occur at the facility, it would most likely occur at a connection point. The above table addresses these potential spill sources as pipe failure and leaking

pipe or valve failure. In the event of a release from any of this equipment, spilled material would follow natural drainage patterns discussed in section 2.1.

3.2 Spill History

No unintentional discharges have been reported at the purification plant.

Section 4
Spill Prevention Procedures

The best prevention against an uncontrolled discharge is regular maintenance and proper use and up-keep of equipment. Proper personnel training concerning facility equipment and operations is also a key factor guarding against spill events. Refer to section 7 of this plan regarding equipment inspections and testing, and section 8 regarding training procedures. Section 9 describes the security at the facility.

4.1 Bulk Storage Containers

The oil storage tanks and process vessels located at the facility are constructed of materials which are compatible with the substances they contain thereby preventing tank failure due to material incompatibility. The tanks are equipped with appropriate ventilation for fill and withdrawal rates to prevent spillage resulting from excess pressure within the tanks. The three 8,820-gallon drip/condensate tanks are equipped with water draw off valves. All tank valves and other valve drains that could allow flow from tanks are secured in the closed position when not in use.

The 90,000-gallon drip/condensate tank is a sealed pressure vessel equipped with a relief valve and pressure alarm. The alarm is monitored 24 hours per day allowing for immediate leak detection. This tank is used for the temporary storage of pipeline liquids prior to transferring them to the three 8,820-gallon drip/condensate tanks.

Abnormal pressure or liquid level changes in some process vessels trigger the plant alarm and shutdown system. The alarm and shutdown system are monitored 24 hours per day via telemetering hookup to the Transmission Gas Control Operator in Carlsbad.

4.2 Facility Transfer Operations, Pumping, and In-Plant Process Piping

The oil transport pipelines at the facility and above ground supports are constructed of steel. Pipe supports are designed to minimize abrasion and corrosion and allow for expansion and contraction of the pipeline, thereby minimizing the likelihood for leaks and ruptures resulting from construction flaws. Underground pipes are equipped with a protective wrap or coating.

Currently, there are no pipelines susceptible to damage from vehicles at the facility. If however, in the course of new pipe installation or repairs, it is deemed that some piping will be susceptible to damage from vehicles, warning signs will be posted near relevant pipelines.

Abnormal pressure changes within the pipeline system of the plant trigger pressure alarms within some process vessels which shutdown operations. Therefore, leaks and ruptures within the pipeline can be detected prior to complete pipe failure resulting from excess pressure.

The 356-gallon DEA and oil tank and the two 419-gallon waste water tanks are transfer sumps. These tanks are open top, below-grade tanks equipped with grates over the openings to prevent accidental intrusion.

Loading/unloading connections are securely sealed when not in use. Securely closed valves and pumps prevent spillage and leaks resulting from accidental encounters with facility personnel.

The process area of the plant is graveled to allow for early leak detection and immediate response by plant personnel in the event of a spill.

4.3 Tank Truck Transfer Operations

The facility utilizes local contractors for removing oils at the facility. All transfers between tank trucks and facility tanks are conducted manually to prevent uncontrolled releases from storage tanks and tank trucks.

The three 8,820-gallon drip/condensate tanks are interconnected at the bottom of the tanks for material transfer purposes. Therefore, all three tanks can be emptied via one outlet drain.

Section 5
Spill Controls

5.1 Bulk Storage Tanks

To prevent leaks or spills from spreading, Indian Hills has incorporated spill control devices for its storage tanks. The tank table in appendix 3 describes the secondary containment parameters for each of the storage tanks located at the facility. As shown on the table, some of the liquid storage tanks have inadequate secondary containment according to the current requirements of the OCD (1.33 times the volume of the largest tank as of 1992 regulations) or the EPA (1.10 times the volume of the largest tank). To meet the contingency plan requirements of 40 CFR 112.7, all tanks containing oil will comply with the EPA's containment requirements within one year of SPCC Plan-certification.

5.2 Facility Transfer Operations, Pumping, and In-Plant Process Piping

Above ground piping, pumps, and valves are located within graveled areas of the facility. The gravel provides a medium which slows the flow rate of spills and allows for easy detection. Therefore, in the event of a spill or leak, discharged material is in contact with a minimal amount of ground cover between the actual time of the spill or leak and the time of response.

In the event of a leak from pipes or valves, facility personnel utilize buckets and or spill basins to contain leaking material until appropriate repairs are made. Sorbent materials are used to contain seeps and leaks from the compressors.

The amine pumps are located over a concrete pad equipped with a drain line to the DEA and oil tank.

5.3 Tank Truck Transfer Operations

When loading/unloading tank trucks, spill pads or basins are placed below transfer valves to contain leaks and small spills which might otherwise be deposited on the ground surface.

Section 6
Spill Countermeasures

This section has been prepared in a format designed for easy reference during spill events. **If there is currently a spill event in progress, please refer immediately to the flow diagrams beginning on page 11 for appropriate spill response procedures.**

Various types of spill events may occur at the facility. This section addresses three specific types of oil spills which are most likely to occur at the facility. Facility personnel have been instructed and trained in response procedures for the three types of spill events (see section 8 for training procedures). The facility owner is confident that these response procedures can be altered as necessary to address spills which do not specifically fit into one of the three categories.

The facility maintains shovels, drums, brooms, rags, and storage drums on site for use in the event of a spill. In anticipation of the possible need for heavy equipment during an uncontrolled spill event, the facility owner will contract local rental companies to provide the facility with necessary heavy equipment and experienced operators.

Reportability of the various spill types depends on the substance and quantity spilled. To determine reporting applicability, facility personnel will refer to the *GCNM Spill Manual* which is kept on site in the plant office. The manual contains documentation forms and reporting guidelines to follow in the event of a spill. The facility owner is aware that, according to 40 CFR 112.4, "in the event of an oil spill of 1,000 gallons or more into any of the navigable waters of the US or adjoining shorelines, or a discharge of harmful quantities of oil in two events within a twelve month period" from the facility, they are required to submit a copy of the facility's SPCC Plan to the EPA Region VI administrator within 60 days of the spill event. Additionally, in the event of such a spill, the facility owner will submit copies of the Plan to proper State and local authorities as outlined in the *Spill Manual*. As previously mentioned in section 1, spills at the facility are regulated primarily by OCD. Therefore, the facility owner will contact OCD in the event of a spill in accordance with OCD guidelines. Copies of necessary reporting forms are located in the *Spill Manual*.

SPILL RESPONSE PROCEDURES
FOR INDIAN HILLS PURIFICATION PLANT

These procedures should be reviewed on a regular basis by facility personnel. **In the event of a spill, facility personnel should immediately follow the guidelines set forth in this section.**

According to the OSHA Hazardous Communication Program, employers are required to provide Material Safety Data Sheets (MSDS) to employees for chemicals used and stored at facilities. Facility personnel should review the MSDS for the various oils used and stored at the facility in order to familiarize themselves with the chemical properties of the oils. The MSDS are an important part of spill response; they provide health and reactivity data on substances. Therefore, it is necessary that facility personnel review the MSDS prior to a spill event to ensure their health and safety while responding to a spill event. MSDS for on site substances should be kept in a location accessible to all facility and emergency response personnel.

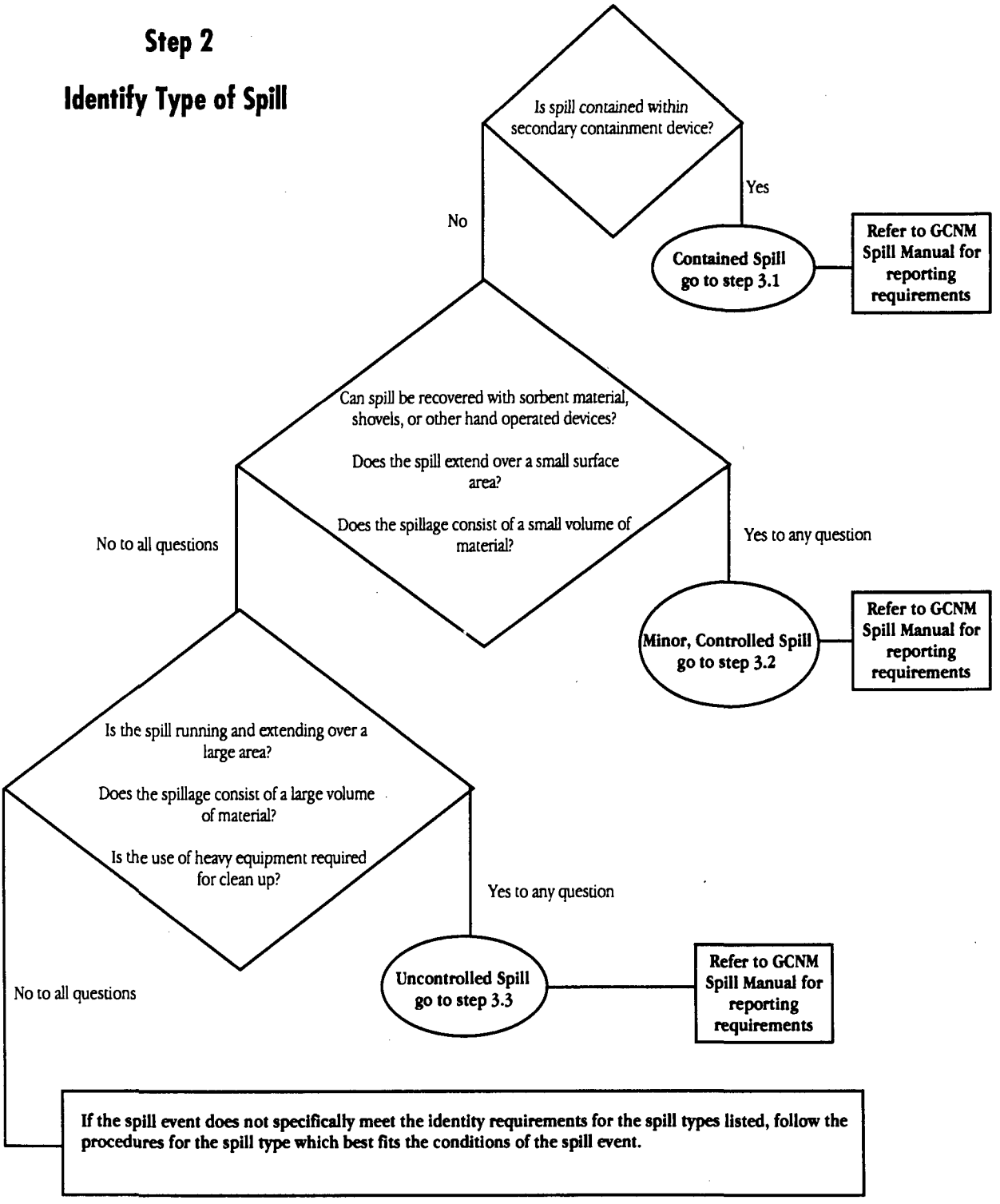
Step 1

Stop Spill

- Identify source.
- Stop source.
  Close necessary valves and pumps.
- Seal necessary equipment.

Step 2

Identify Type of Spill



Step 3
Containment and Clean Up

3.1

Contained Spill

- Inspect containment area for seepage and leaks - repair if necessary.

- Small volume of material
  Remove material with shovel.
  or
  Add water to the containment area and pump material into drums or storage tanks for disposal.
  or
  Add water to the containment area and skim oils from the surface of the water. Place recovered material into drums or storage tanks for disposal. Allow water to evaporate.

- Large volume of material
  Remove material with pumps and store in drums or storage tanks for disposal.

3.2

Minor, Controlled Spill

- Stop the flow of material with sorbent materials or construct small earthen berms.

- Recover spilled material with sorbent materials or shovels and place in drums or storage tanks for disposal.

- Remove contaminated soil or other ground surfaces from the spill site and place into appropriate containers for off site disposal. If an OCD-approved land farm is located on site, place contaminated soils there.

3.3

Uncontrolled Spill

- Stop the flow of material by creating low areas in the terrain ahead of the spill in order to collect the material. Most often, this will require the use of backhoes or other similar equipment. It may be necessary to rent equipment and skilled operators from the nearest town.

- Follow the clean up guidelines established in 3.1 for large volume spills.

- If the spill has contaminated a large amount of soil, excavate the contaminated area. If there is not an on site land farm, follow these procedures.
    - Pile the soil removed from the excavation on site.
    - Line the excavation with an impermeable liner.
    - Place soil back in excavation.
    - Wash the soil using high pressure hoses.
    - Skim oils off the surface of the water.
    - Place recovered material into drums or storage tanks for disposal.
    - Pump remaining water into drums or tanks or allow to evaporate.

Section 7
Inspections, Tests and Records

Inspections are an important part of preventing spills due to equipment or containment system failure. Inspection and maintenance records provide the only real evidence of compliance with the EPA's regulations should this facility be audited.

All areas of the facility, including process vessels and tanks are visually inspected on a regular basis by plant personnel. These inspections have been incorporated into the facility's preventative maintenance schedule. Records of the following inspections will be kept in appendix 4 of the SPCC Plan at the plant office for at least three years.

Bulk storage tanks and oil-containing process systems

- above ground tanks - regular visual inspection for deterioration and leaks. Other testing according to plant standard operating procedures.
- below-grade tanks - liquid level of tanks monitored daily.
- pipe supports, pipes, valves, and pumps - regular visual inspection.
- ESD and relief valves - tested annually.
- storage tank flow valves, supports, foundations - regular visual inspections.
- storage tank level gauges - regular mechanical function testing/visual inspections.
- underground pipes that are unearthed - inspect for cracks, leaks or rust.

Dikes, berms, secondary containment systems

- containment dike and berm integrity - regular visual inspection.
- earthen berms - rebuilt as necessary.
- rainwater in containment areas - inspection for oil sheen before allowing water to evaporate.
- records of drainage of rainwater from containment areas - recorded whenever areas are drained.

Section 8
Personnel and Training Procedures

Facility personnel will receive ongoing instruction in the operation and maintenance of equipment to prevent the discharge of oil and degradation of the environment. Facility personnel will also be instructed in the spill response procedures outlined in section 6. The facility supervisor is responsible for oil spill prevention and ensuring that this SPCC Plan is implemented and remains current.

The facility supervisor will report regularly to operating personnel on the status of plan compliance and any issues surrounding oil spills. Briefings will highlight and describe known spill events or failures, malfunctioning components, and recently developed precautionary measures. Records and attendance sheets for these briefings will be kept in appendix 5 of this plan for a minimum of three years.

The SPCC Plan will be kept accessible to all facility employees.

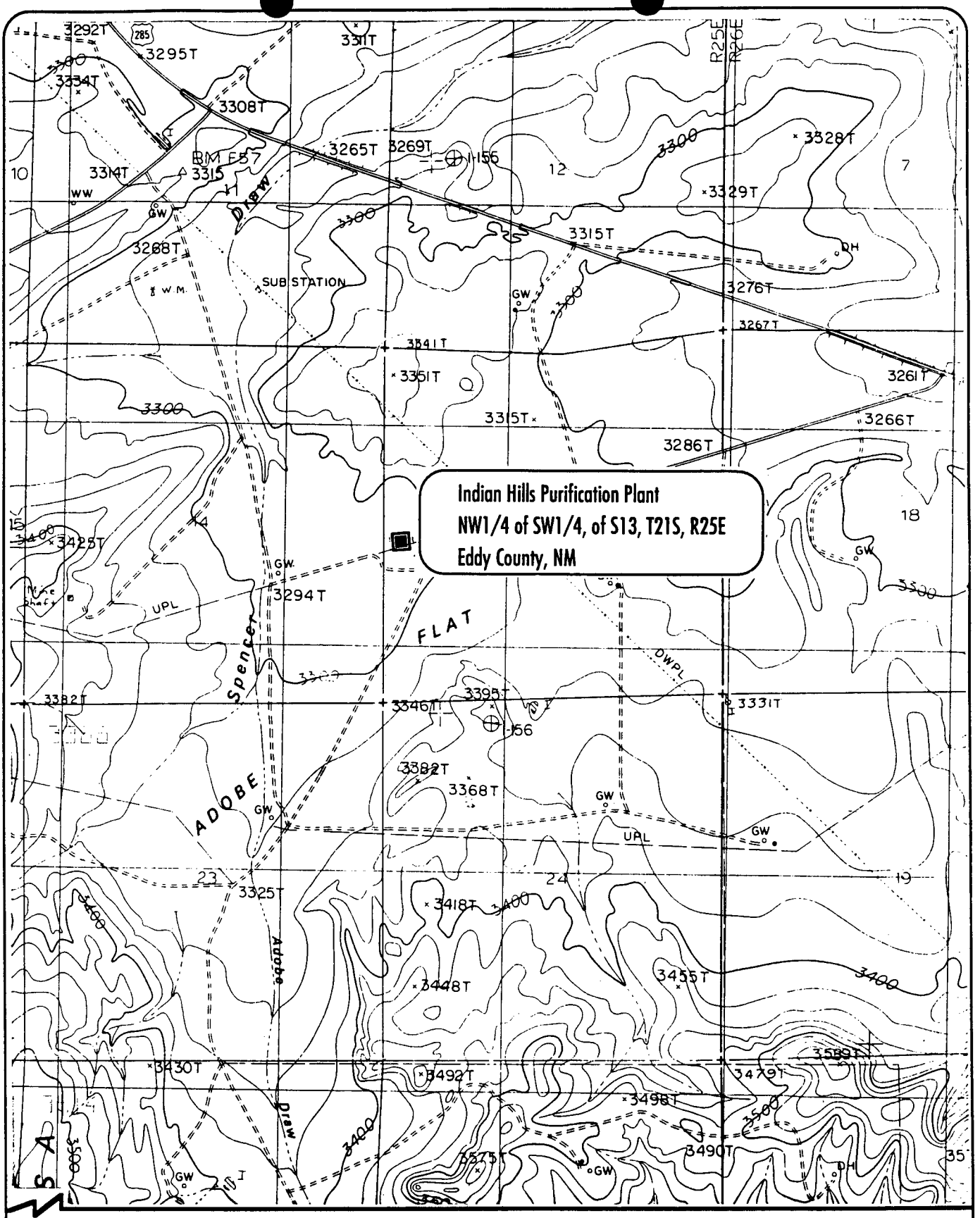
Section 9
Security

Security is an important part of preventing spills. Security also assists in preventing acts of vandalism which lead to spills.

Since the facility is completely fenced, located in a rural, sparsely populated region, and is well lit at night, its exposure to vandalism is low. The facility is attended by two GCNM personnel during normal daylight hours seven days a week. Walk-through and drive-through gates are kept locked when the facility is unattended.

All valves which permit the direct outward flow of the contents of a tank to the ground surface have adequate security measures to ensure that they remain in the closed position when in non-operating or non-standby status.

The starter control on all oil pumps are either kept locked in the "off" position or are located at a site accessible only to authorized personnel when the pumps are in a non-operating or non-standby status.



Environmental Services Inc • 4665 Indian School NE • Suite 106 • Albuquerque NM 87110 • 505 266 6611

N

Incoming Power

Plant Waste Storage 10 10

Condensate Trap

Waste Water Pump

Acid Gas Line

12

Water Storage From Regenerator 8

Glycol Storage 5

Glycol Regenerator

Water Pump

Water Storage 11 11

x Actual location of tank #12

6 TEMPORARY STORAGE

Road

Filter Storage Building

Amine Filter Cases

Charcoal Vessel

Amine & Acid Gas Fin Fans

Flash Tank

Contactor Scrubber

Switch Rack

Surge Tank

Amine-Amine Exchanger

Still

Reflux Pump

Reflux Accumulator

DEA Storage 4

4 DEA Storage

Steamer

Reboiler

Amine Pumps

Transfer Switch

Emergency Generator

9 Pump Building Waste Storage

7 Waste Storage

Glycol Contactor

Tail Scrubber

Gas Amine Exchanger

Inlet Outlet Pipe Runs

Meter House

Office Building

Shutdown System

H2S Analyzers

Plant H2S Monitor

Septic Tank

Sweet Gas Meter Run

Inlet Gas Filter Separator Cases

1 1 1 Methanol Storage

Pig Receiver

3 Liquid Receiver

Gas

Liquids

2 2 2 Condensate Custody Transfer

210 Tanks

Flair Stack

GAS FLOW

Gas Amine Exchanger

Contactor Scrubber

Tail Scrubber

Glycol Contactor

Inlet

Outlet

To Flair FLARE

Fin Fan

Reflux Accumulator

Reflux (water)

Still

Flash Tank

ACID FLOW

AMINE FLOW

Contactor Scrubber

Flash Tank

Filter

Charcoal

Still

Reboiler

Gas-Amine Exchanger

Amine-Amine Exchanger

Fin Fans

Pump

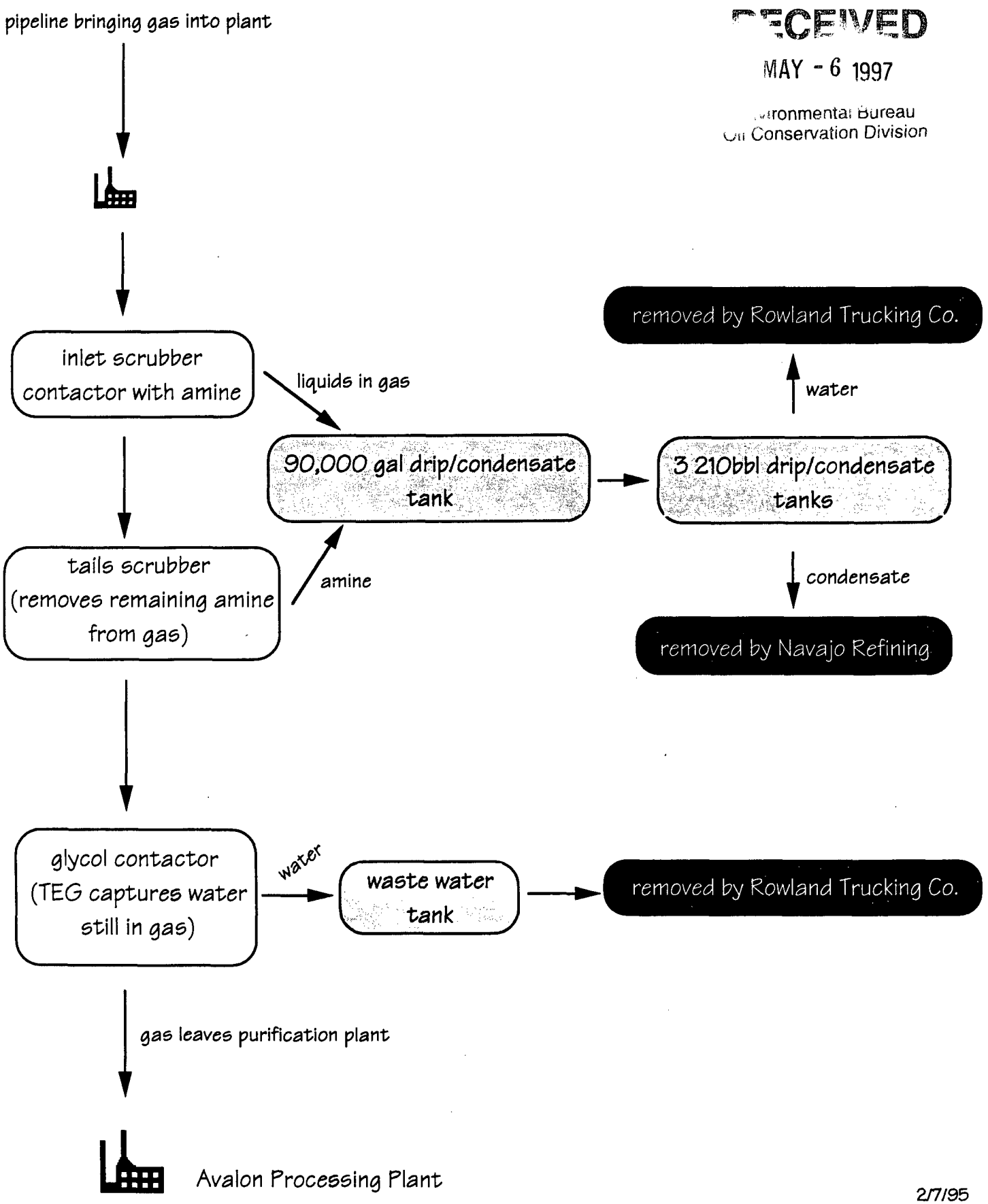
Surge Tank

GAS COMPANY OF NEW MEXICO

PURIFICATION PLANT PLOT PLAN

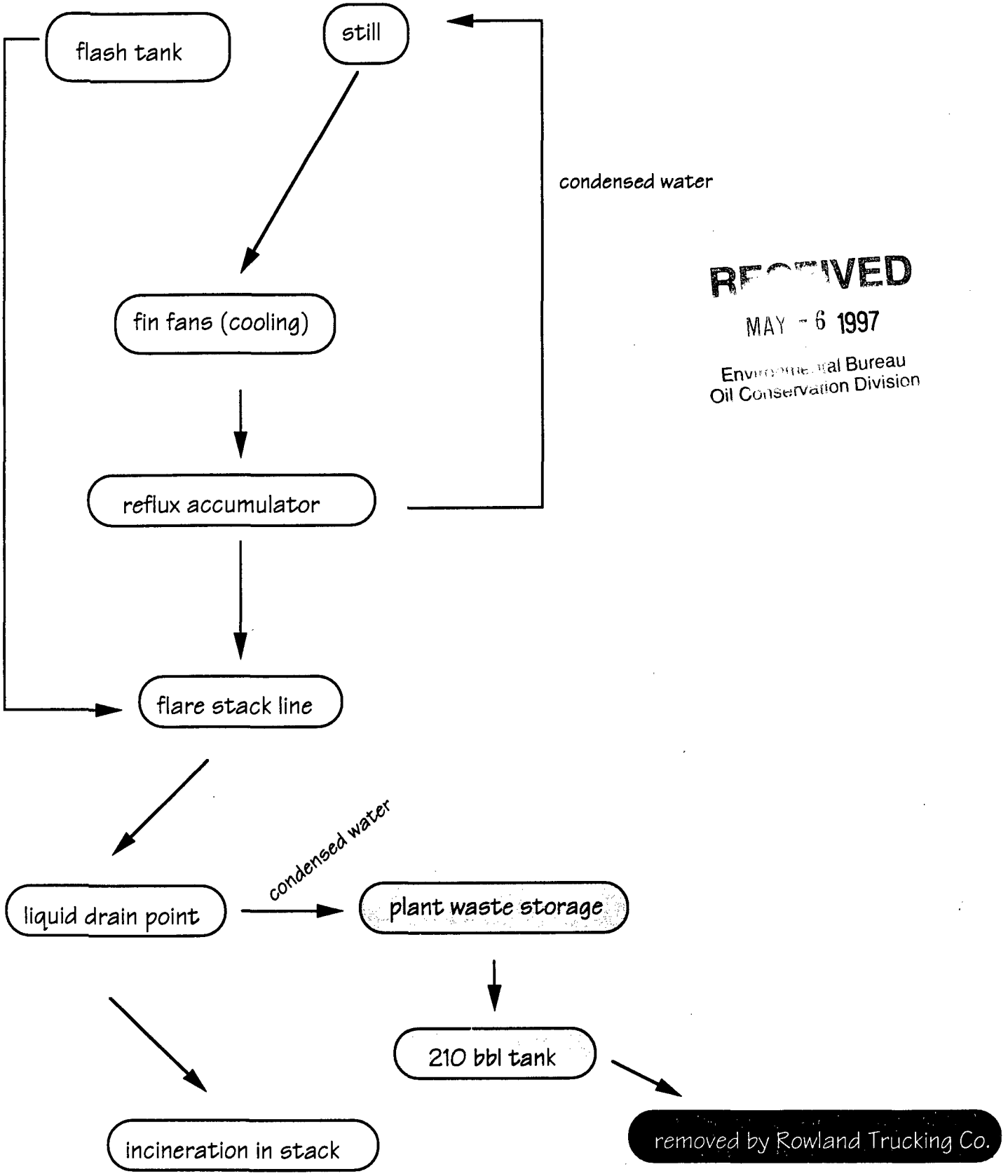
DRAWN BY: KEITH TIDWELL	DATE: 8-23-94	REVISED

Indian Hills Purification Plant
Illustration of Gas Flow



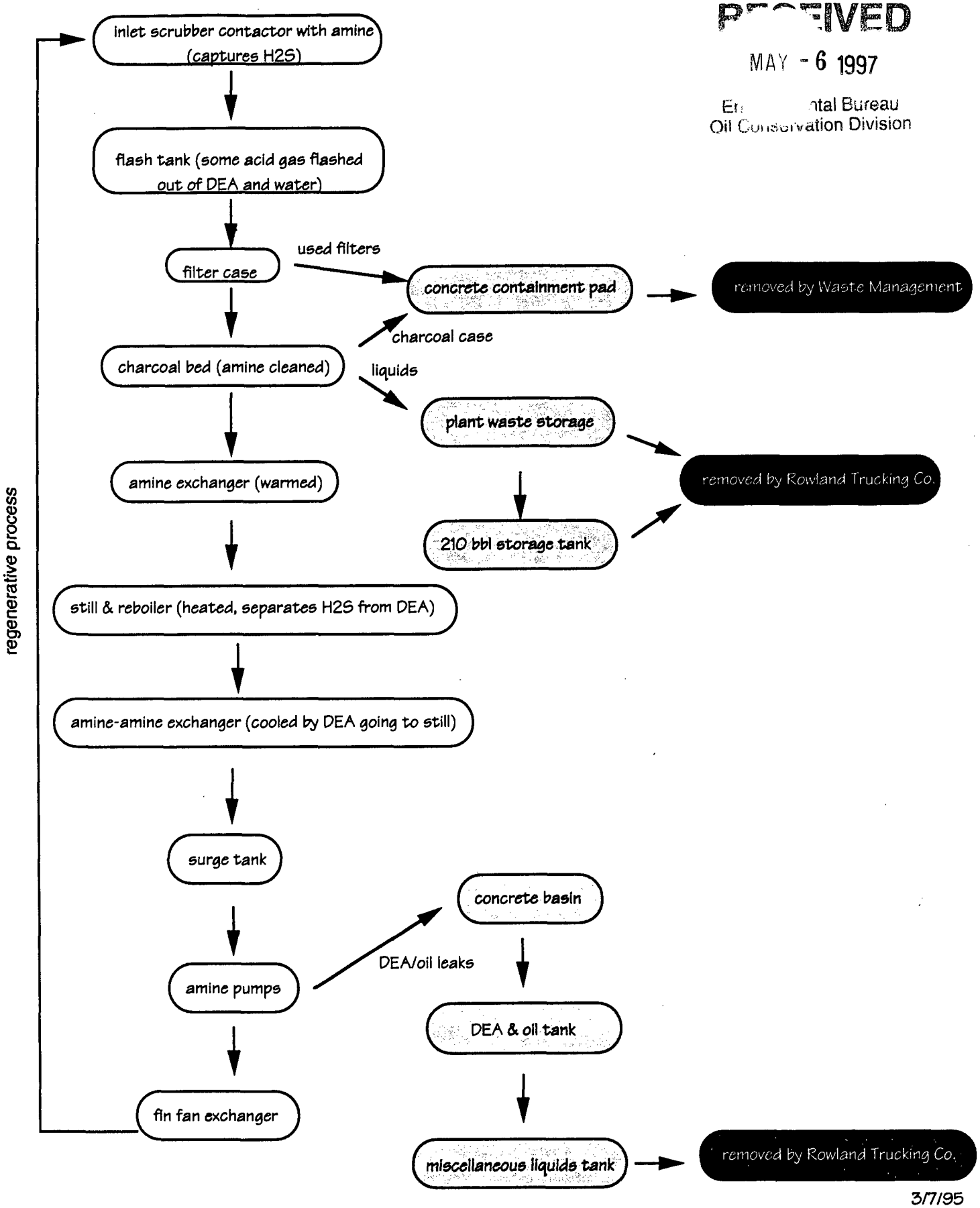
2/7/95

Indian Hills Purification Plant
Illustration of Acid Gas Flow



2/7/95

Indian Hills Purification Plant
Illustration of DEA Flow



3/7/95

Indian Hills Purification Plant

Tank Inventory and Secondary Containment Areas

Secondary Containment Area	Storage Tanks		Tank Cap. (gal)	Secondary Containment Cap.(gal)	Containment Construction	Oil?*	Direction of spill	Tank Const.	Compliance with: OCD** (133 %)	Compliance with: SPCC*** (110 %)	Notes
Methanol storage	1	Methanol	1,057[1] 2@561[1]	0		no	na	steel steel	no	na	
Drip/condensate storage	2	Drip/condensate****	3@8,820[1]					steel			
		Total tank volume[4] =	26,460	35,327[1]	earthen	yes	N		yes	yes	
Liquid receiver	3	Drip/condensate****	90,000[2]	0[3]		yes	N	steel	no	no	
DEA storage	4	Diethanolamine	2@1,213[1]	0		no	na	steel	no	na	
Glycol storage	5	Triethyleneglycol	647[1]	136[1]		no	na	steel	no	na	Tank on concrete pad with angle iron.
Temporary storage	6	Diethanolamine	8,820[1]	0[3]		yes	N	steel	no	no	
Waste storage	7	Miscellaneous liquids	8,820[1]	14,269[1]	earthen	yes	N	steel	yes	yes	
Water storage from regenerator	8	waste water	321[1]	0[3]		yes	N	fiberglass	no	yes	
Pump building waste storage	9	Diethanolamine & oil	356[1]	530[1]	concrete	yes	N	steel	yes	yes	Transfer sump. Steel tank in concrete pit. Enough clearance between liner and tank to inspect for leakage.
Primary plant waste storage	10	Waste water	2@419[1]	680[1]	concrete	yes	N	steel	yes	yes	Transfer sump. Steel tank in concrete pit. Enough clearance between liner and tank to inspect for leakage.
Water storage	11	Fresh water	2@8,820[1]	na		no	na	steel	na	na	
Secondary plant waste storage	12	Waste water	8,820[1]	0[3]		yes	N	steel	no	no	

[1] Volume calculated by field measurement

[2] Manufacturer's labeled volume rating

[3] Secondary containment will be installed per contingency plan requirements of 40 CFR 122.7.

[4] Tanks are interconnected.

na - not applicable

* As defined for purposes of SPCC regulations.

** Tanks which are regulated under the jurisdiction of the OCD. These tanks must be equipped with secondary containment capable of containing 1.3 times the volume of the largest tank or combined volume of interconnected tanks for which it is providing containment.
yes = secondary containment currently in compliance with OCD guidelines
no = secondary containment currently not in compliance with OCD guidelines, but are required to follow guidelines.
na = tanks and secondary containment not regulated by OCD

*** Tanks which fall under SPCC regulations. These tanks should be equipped with secondary containment capable of containing 1.1 times the volume of the largest tank or combined volume of interconnected tanks for which it is providing containment.
yes = secondary containment currently meets SPCC recommendations
no = secondary containment does not currently meet with SPCC recommendations
na = tanks and secondary containment not addressed by SPCC guidelines

**** The term "drip/condensate" is used to describe miscellaneous hydrocarbon-containing liquids from a variety of sources.

Tank capacities based on estimates or information provided by facility personnel unless otherwise noted.

Sign-In Sheet - Indian Hills Purification Plant Briefings

Name	Date

PART 112—OIL POLLUTION PREVENTION

AUTHORITY: Secs. 311(j)(1)(C), 311(j)(2), 501(a), Federal Water Pollution Control Act (sec. 2, Pub. L. 92-500, 86 Stat. 816 et seq. (33 U.S.C. 1251 et seq.)); sec. 4(b), Pub. L. 92-500, 86 Stat. 897; 5 U.S.C. Reorg. Plan of 1970 No. 3 (1970), 35 FR 15623, 3 CFR 1966-1970 Comp.; E.O. 11735, 38 FR 21243, 3 CFR.

SOURCE: 38 FR 34165, Dec. 11, 1973, unless otherwise noted.

§ 112.1 General applicability.

(a) This part establishes procedures, methods and equipment and other requirements for equipment to prevent the discharge of oil from non-transportation-related onshore and offshore facilities into or upon the navigable waters of the United States or adjoining shorelines.

(b) Except as provided in paragraph (d) of this section, this part applies to owners or operators of non-transportation-related onshore and offshore facilities engaged in drilling, producing, gathering, storing, processing, refining, transferring, distributing or consuming oil and oil products, and which, due to their location, could reasonably be expected to discharge oil in harmful quantities, as defined in part 110 of this chapter, into or upon the navigable waters of the United States or adjoining shorelines.

(c) As provided in section 313 (86 Stat. 875) departments, agencies, and

(h) *Transportation-related* and *non-transportation-related* as applied to an onshore or offshore facility, are defined in the Memorandum of Understanding between the Secretary of Transportation and the Administrator of the Environmental Protection Agency, dated November 24, 1971, 36 FR 24080.

(i) *Spill event* means a discharge of oil into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities, as defined at 40 CFR part 110.

(j) *United States* means the States, the District of Columbia, the Commonwealth of Puerto Rico, the Canal Zone, Guam, American Samoa, the Virgin Islands, and the Trust Territory of the Pacific Islands.

(k) The term *navigable waters* of the United States means *navigable waters* as defined in section 502(7) of the FWPCA, and includes:

(1) All navigable waters of the United States, as defined in judicial decisions prior to passage of the 1972 Amendments to the FWPCA (Pub. L. 92-500), and tributaries of such waters;

(2) Interstate waters;

(3) Intrastate lakes, rivers, and streams which are utilized by interstate travelers for recreational or other purposes; and

(4) Intrastate lakes, rivers, and streams from which fish or shellfish are taken and sold in interstate commerce.

(l) *Vessel* means every description of watercraft or other artificial contrivance used, or capable of being used as a means of transportation on water, other than a public vessel.

§ 112.3 Requirements for preparation and implementation of Spill Prevention Control and Countermeasure Plans.

(a) Owners or operators of onshore and offshore facilities in operation on or before the effective date of this part that have discharged or, due to their location, could reasonably be expected to discharge oil in harmful quantities, as defined in 40 CFR part 110, into or upon the navigable waters of the United States or adjoining shorelines, shall prepare a Spill Prevention Control and Countermeasure Plan (hereinafter "SPCC Plan"), in writing and in accordance with § 112.7. Except as provided for in paragraph (f) of this section, such SPCC Plan shall be prepared within six months after the effective date of this part and shall be fully implemented as soon as possible, but not later than one year after the effective date of this part.

(b) Owners or operators of onshore and offshore facilities that become operational after the effective date of this part, and that have discharged or could reasonably be expected to discharge oil in harmful quantities, as defined in 40 CFR part 110, into or upon the navigable waters of the United States or adjoining shorelines, shall prepare an SPCC Plan in accordance with § 112.7. Except as provided for in paragraph (f) of this section, such SPCC Plan shall be prepared within six months after the date such facility begins operations and shall be fully implemented as soon as possible, but not later than one year after such facility begins operations.

(c) Owners or operators of onshore and offshore mobile or portable facilities, such as onshore drilling or workover rigs, barge mounted offshore drilling or workover rigs, and portable fueling facilities shall prepare and implement an SPCC Plan as required by paragraphs (a), (b) and (d) of this section. The owners or operators of such facility need not prepare a new SPCC Plan each time the facility is moved to a new site. The SPCC Plan may be a general plan, prepared in accordance with § 112.7, using good engineering practice. When the mobile or portable facility is moved, it must be located and installed using the spill prevention practices outlined in the SPCC Plan for the facility. No mobile or portable facility subject to this regulation shall operate unless the SPCC Plan has been implemented. The SPCC Plan shall only apply while the facility is in a fixed (non-transportation) operating mode.

(d) No SPCC Plan shall be effective to satisfy the requirements of this part unless it has been reviewed by a Registered Professional Engineer and certified to by such Professional Engineer. By means of this certification

(5) Maximum storage or handling capacity of the facility and normal daily throughput;

(6) Description of the facility, including maps, flow diagrams, and topographical maps;

(7) A complete copy of the SPCC Plan with any amendments;

(8) The cause(s) of such spill, including a failure analysis of system or subsystem in which the failure occurred;

(9) The corrective actions and/or countermeasures taken, including an adequate description of equipment repairs and/or replacements;

(10) Additional preventive measures taken or contemplated to minimize the possibility of recurrence;

(11) Such other information as the Regional Administrator may reasonably require pertinent to the Plan or spill event.

(b) Section 112.4 shall not apply until the expiration of the time permitted for the preparation and implementation of an SPCC Plan pursuant to § 112.3 (a), (b), (c) and (f).

(c) A complete copy of all information provided to the Regional Administrator pursuant to paragraph (a) of this section shall be sent at the same time to the State agency in charge of water pollution control activities in and for the State in which the facility is located. Upon receipt of such information such State agency may conduct a review and make recommendations to the Regional Administrator as to further procedures, methods, equipment and other requirements for equipment necessary to prevent and to contain discharges of oil from such facility.

(d) After review of the SPCC Plan for a facility subject to paragraph (a) of this section, together with all other information submitted by the owner or operator of such facility, and by the State agency under paragraph (c) of this section, the Regional Administrator may require the owner or operator of such facility to amend the SPCC Plan if he finds that the Plan does not meet the requirements of this part or that the amendment of the Plan is necessary to prevent and to contain discharges of oil from such facility.

(e) When the Regional Administrator proposes to require an amendment to the SPCC Plan, he shall notify the facility operator by certified mail addressed to, or by personal delivery to, the facility owner or operator, that he proposes to require an amendment to the Plan, and shall specify the terms of such amendment. If the facility owner or operator is a corporation, a copy of such notice shall also be mailed to the registered agent, if any, of such corporation in the State where such facility is located. Within 30 days from receipt of such notice, the facility owner or operator may submit written information, views, and arguments on the amendment. After considering all relevant material presented, the Regional Administrator shall notify the facility owner or operator of any amendment required or shall rescind the notice. The amendment required by the Regional Administrator shall become part of the Plan 30 days after such notice, unless the Regional Administrator, for good cause, shall specify another effective date. The owner or operator of the facility shall implement the amendment of the Plan as soon as possible, but not later than six months after the amendment becomes part of the Plan, unless the Regional Administrator specifies another date.

(f) An owner or operator may appeal a decision made by the Regional Administrator requiring an amendment to an SPCC Plan. The appeal shall be made to the Administrator of the United States Environmental Protection Agency and must be made in writing within 30 days of receipt of the notice from the Regional Administrator requiring the amendment. A complete copy of the appeal must be sent to the Regional Administrator at the time the appeal is made. The appeal shall contain a clear and concise statement of the issues and points of fact in the case. It may also contain additional information from the owner or operator, or from any other person. The Administrator or his designee may request additional information from the owner or operator, or from any other person. The Administrator or his designee shall render a decision within 60 days of receiving the appeal and shall notify the owner or operator of his decision.

(i) Curbing, drip pans;

(ii) Sumps and collection systems.

(d) When it is determined that the installation of structures or equipment listed in § 112.7(c) to prevent discharged oil from reaching the navigable waters is not practicable from any onshore or offshore facility, the owner or operator should clearly demonstrate such impracticability and provide the following:

(1) A strong oil spill contingency plan following the provision of 40 CFR part 109.

(2) A written commitment of manpower, equipment and materials required to expeditiously control and remove any harmful quantity of oil discharged.

(e) In addition to the minimal prevention standards listed under § 112.7(c), sections of the Plan should include a complete discussion of conformance with the following applicable guidelines, other effective spill prevention and containment procedures (or, if more stringent, with State rules, regulations and guidelines):

(1) *Facility drainage (onshore); (excluding production facilities).* (i) Drainage from diked storage areas should be restrained by valves or other positive means to prevent a spill or other excessive leakage of oil into the drainage system or inplant effluent treatment system, except where plan systems are designed to handle such leakage. Diked areas may be emptied by pumps or ejectors; however, these should be manually activated and the condition of the accumulation should be examined before starting to be sure no oil will be discharged into the water.

(ii) Flapper-type drain valves should not be used to drain diked areas. Valves used for the drainage of diked areas should, as far as practical, be of manual, open-and-closed design. When plant drainage drains directly into water courses and not into wastewater treatment plants, retained storm water should be inspected as provided in paragraphs (e)(2)(iii) (B), (C) and (D) of this section before drainage.

(iii) Plant drainage systems from undiked areas should, if possible, flow into ponds, lagoons or catchment basins, designed to retain oil or return it to the facility. Catchment basins should not be located in areas subject to periodic flooding.

(iv) If plant drainage is not engineered as above, the final discharge of all in-plant ditches should be equipped with a diversion system that could, in the event of an uncontrolled spill, return the oil to the plant.

(v) Where drainage waters are treated in more than one treatment unit, natural hydraulic flow should be used. If pump transfer is needed, two "lift" pumps should be provided, and at least one of the pumps should be permanently installed when such treatment is continuous. In any event, whatever techniques are used facility drainage systems should be adequately engineered to prevent oil from reaching navigable waters in the event of equipment failure or human error at the facility.

(2) *Bulk storage tanks (onshore); (excluding production facilities).* (i) No tank should be used for the storage of oil unless its material and construction are compatible with the material stored and conditions of storage such as pressure and temperature, etc.

(ii) All bulk storage tank installations should be constructed so that a secondary means of containment is provided for the entire contents of the largest single tank plus sufficient freeboard to allow for precipitation. Diked areas should be sufficiently impervious to contain spilled oil. Dikes, containment curbs, and pits are commonly employed for this purpose, but they may not always be appropriate. An alternative system could consist of a complete drainage trench enclosure arranged so that a spill could terminate and be safely confined in an inplant catchment basin or holding pond.

(iii) Drainage of rainwater from the diked area into a storm drain or an effluent discharge that empties into an open water course, lake, or pond, and bypassing the in-plant treatment system may be acceptable if:

(A) The bypass valve is normally sealed closed.

(B) Inspection of the run-off rain water ensures compliance with applicable water quality standards and will

be the more frequent use of exposed pipe corridors or galleries.

(ii) When a pipeline is not in service, or in standby service for an extended time the terminal connection at the transfer point should be capped or blank-flanged, and marked as to origin.

(iii) Pipe supports should be properly designed to minimize abrasion and corrosion and allow for expansion and contraction.

(iv) All aboveground valves and pipelines should be subjected to regular examinations by operating personnel at which time the general condition of items, such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces should be assessed. In addition, periodic pressure testing may be warranted for piping in areas where facility drainage is such that a failure might lead to a spill event.

(v) Vehicular traffic granted entry into the facility should be warned verbally or by appropriate signs to be sure that the vehicle, because of its size, will not endanger above ground piping.

(4) *Facility tank car and tank truck loading/unloading rack (onshore).* (i) Tank car and tank truck loading/unloading procedures should meet the minimum requirements and regulation established by the Department of Transportation.

(ii) Where rack area drainage does not flow into a catchment basin or treatment facility designed to handle spills, a quick drainage system should be used for tank truck loading and unloading areas. The containment system should be designed to hold at least maximum capacity of any single compartment of a tank car or tank truck loaded or unloaded in the plant.

(iii) An interlocked warning light or physical barrier system, or warning signs, should be provided in loading/unloading areas to prevent vehicular departure before complete disconnect of flexible or fixed transfer lines.

(iv) Prior to filling and departure of any tank car or tank truck, the lowermost drain and all outlets of such vehicles should be closely examined for leakage, and if necessary, tightened, adjusted, or replaced to prevent liquid leakage while in transit.

(5) *Oil production facilities (onshore)*—(i) *Definition.* An onshore production facility may include all wells, flowlines, separation equipment, storage facilities, gathering lines, and auxiliary non-transportation-related equipment and facilities in a single geographical oil or gas field operated by a single operator.

(ii) *Oil production facility (onshore) drainage.* (A) At tank batteries and central treating stations where an accidental discharge of oil would have a reasonable possibility of reaching navigable waters, the dikes or equivalent required under § 112.7(c)(1) should have drains closed and sealed at all times except when rainwater is being drained. Prior to drainage, the diked area should be inspected as provided in paragraphs (e)(2)(iii) (B), (C), and (D) of this section. Accumulated oil on the rainwater should be picked up and returned to storage or disposed of in accordance with approved methods.

(B) Field drainage ditches, road ditches, and oil traps, sumps or skimmers, if such exist, should be inspected at regularly scheduled intervals for accumulation of oil that may have escaped from small leaks. Any such accumulations should be removed.

(iii) *Oil production facility (onshore) bulk storage tanks.* (A) No tank should be used for the storage of oil unless its material and construction are compatible with the material stored and the conditions of storage.

(B) All tank battery and central treating plant installations should be provided with a secondary means of containment for the entire contents of the largest single tank if feasible, or alternate systems such as those outlined in § 112.7(c)(1). Drainage from undiked areas should be safely confined in a catchment basin or holding pond.

(C) All tanks containing oil should be visually examined by a competent person for condition and need for maintenance on a scheduled periodic basis. Such examination should include the foundation and supports of tanks that are above the surface of the ground.

separator, parallel redundant dump valves, or other feasible alternatives to prevent oil discharges.

(v) Atmospheric storage or surge tanks should be equipped with high liquid level sensing devices or other acceptable alternatives to prevent oil discharges.

(vi) Pressure tanks should be equipped with high and low pressure sensing devices to activate an alarm and/or control the flow or other acceptable alternatives to prevent oil discharges.

(vii) Tanks should be equipped with suitable corrosion protection.

(viii) A written procedure for inspecting and testing pollution prevention equipment and systems should be prepared and maintained at the facility. Such procedures should be included as part of the SPCC Plan.

(ix) Testing and inspection of the pollution prevention equipment and systems at the facility should be conducted by the owner or operator on a scheduled periodic basis commensurate with the complexity, conditions and circumstances of the facility or other appropriate regulations.

(x) Surface and subsurface well shut-in valves and devices in use at the facility should be sufficiently described to determine method of activation or control, e.g., pressure differential, change in fluid or flow conditions, combination of pressure and flow, manual or remote control mechanisms. Detailed records for each well, while not necessarily part of the plan should be kept by the owner or operator.

(xi) Before drilling below any casing string, and during workover operations a blowout preventer (BOP) assembly and well control system should be installed that is capable of controlling any well-head pressure that is expected to be encountered while that BOP assembly is on the well. Casing and BOP installations should be in accordance with State regulatory agency requirements.

(xii) Extraordinary well control measures should be provided should emergency conditions, including fire, loss of control and other abnormal conditions, occur. The degree of control system redundancy should vary with hazard exposure and probable consequences of failure. It is recommended that surface shut-in systems have redundant or "fail close" valving. Subsurface safety valves may not be needed in producing wells that will not flow but should be installed as required by applicable State regulations.

(xiii) In order that there will be no misunderstanding of joint and separate duties and obligations to perform work in a safe and pollution free manner, written instructions should be prepared by the owner or operator for contractors and subcontractors to follow whenever contract activities include servicing a well or systems appurtenant to a well or pressure vessel. Such instructions and procedures should be maintained at the offshore production facility. Under certain circumstances and conditions such contractor activities may require the presence at the facility of an authorized representative of the owner or operator who would intervene when necessary to prevent a spill event.

(xiv) All manifolds (headers) should be equipped with check valves on individual flowlines.

(xv) If the shut-in well pressure is greater than the working pressure of the flowline and manifold valves up to and including the header valves associated with that individual flowline, the flowline should be equipped with a high pressure sensing device and shut-in valve at the wellhead unless provided with a pressure relief system to prevent over pressuring.

(xvi) All pipelines appurtenant to the facility should be protected from corrosion. Methods used, such as protective coatings or cathodic protection, should be discussed.

(xvii) Sub-marine pipelines appurtenant to the facility should be adequately protected against environmental stresses and other activities such as fishing operations.

(xviii) Sub-marine pipelines appurtenant to the facility should be in good operating condition at all times and inspected on a scheduled periodic basis for failures. Such inspections should be documented and maintained at the facility.

(8) *Inspections and records.* Inspections required by this part should be

(E) Oil refining facilities including all equipment and appurtenances related thereto as well as in-plant processing units, storage units, piping, drainage systems and waste treatment units used in the refining of oil, but excluding any terminal facility, unit or process integrally associated with the handling or transferring of oil in bulk to or from a vessel.

(F) Oil storage facilities including all equipment and appurtenances related thereto as well as fixed bulk plant storage, terminal oil storage facilities, consumer storage, pumps and drainage systems used in the storage of oil, but excluding inline or breakout storage tanks needed for the continuous operation of a pipeline system and any terminal facility, unit or process integrally associated with the handling or transferring of oil in bulk to or from a vessel.

(G) Industrial, commercial, agricultural or public facilities which use and store oil, but excluding any terminal facility, unit or process integrally associated with the handling or transferring of oil in bulk to or from a vessel.

(H) Waste treatment facilities including in-plant pipelines, effluent discharge lines, and storage tanks, but excluding waste treatment facilities located on vessels and terminal storage tanks and appurtenances for the reception of oily ballast water or tank washings from vessels and associated systems used for off-loading vessels.

(I) Loading racks, transfer hoses, loading arms and other equipment which are appurtenant to a nontransportation-related facility or terminal facility and which are used to transfer oil in bulk to or from highway vehicles or railroad cars.

(J) Highway vehicles and railroad cars which are used for the transport of oil exclusively within the confines of a nontransportation-related facility and which are not intended to transport oil in interstate or intrastate commerce.

(K) Pipeline systems which are used for the transport of oil exclusively within the confines of a nontransportation-related facility or terminal facility and which are not intended to transport oil in interstate or intrastate commerce, but excluding pipeline systems used to transfer oil in bulk to or from a vessel.

(2) *Transportation-related onshore and offshore facilities* means:

(A) Onshore and offshore terminal facilities including transfer hoses, loading arms and other equipment and appurtenances used for the purpose of handling or transferring oil in bulk to or from a vessel as well as storage tanks and appurtenances for the reception of oily ballast water or tank washings from vessels, but excluding terminal waste treatment facilities and terminal oil storage facilities.

(B) Transfer hoses, loading arms and other equipment appurtenant to a nontransportation-related facility which is used to transfer oil in bulk to or from a vessel.

(C) Interstate and intrastate onshore and offshore pipeline systems including pumps and appurtenances related thereto as well as in-line or breakout storage tanks needed for the continuous operation of a pipeline system, and pipelines from onshore and offshore oil production facilities, but excluding onshore and offshore piping from wellheads to oil separators and pipelines which are used for the transport of oil exclusively within the confines of a nontransportation-related facility or terminal facility and which are not intended to transport oil in interstate or intrastate commerce or to transfer oil in bulk to or from a vessel.

(D) Highway vehicles and railroad cars which are used for the transport of oil in interstate or intrastate commerce and the equipment and appurtenances related thereto, and equipment used for the fueling of locomotive units, as well as the rights-of-way on which they operate. Excluded are highway vehicles and railroad cars and motive power used exclusively within the confines of a nontransportation-related facility or terminal facility and which are not intended for use in interstate or intrastate commerce.

GPM GAS CORPORATION

GPM GAS SERVICES COMPANY
A DIVISION OF PHILLIPS PETROLEUM COMPANY

4044 PENBROOK
ODESSA, TX 79762

September 18, 1995

Indian Hills Purification Plant
Discharge Plan GW-42 Transfer

Mr. William J. LeMay, Director
State of New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
2040 S. Pacheco
Santa Fe, New Mexico 87505

Dear Mr. LeMay:

Pursuant to Water Quality Control Commission (WQCC) regulation 3-111, Transfer of Discharge Plan, William Field Services has transferred to GPM Gas Corporation (GPM) discharge plan GW-42 effective July 1, 1995. Discharge Plan GW-42 was approved on July 20, 1987 and renewed on April 6, 1992. GPM acknowledges receipt of a copy of discharge plan GW-42 for the Indian Hills Purification Plant and agrees to abide by the provisions and requirements of the plan.

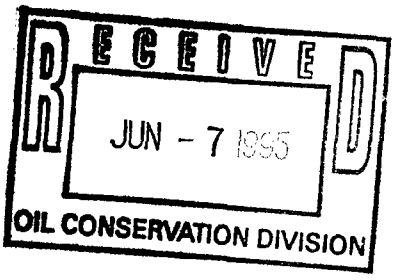
Thank you for your attention to this matter. Please do not hesitate to contact me at (915) 368-1142 should you have any questions or require additional information. Thank you.

Sincerely,

Scott Seeby
Environmental Engineer
New Mexico Region

cc: Mr. Rob M. Hawksworth
Director, Shared Services
Williams Field Services
P.O. Box 58900, M.S. 2G1
Salt Lake City, UT 84158-0900

Public Service Company of New Mexico



June 1, 1995

Roger Anderson
Oil Conservation Division
Energy, Minerals, and Natural Resources Department
State of New Mexico
2040 S. Pacheco
Santa Fe, NM 87505

Subject: Discharge Plan GW-42; expiration April 6, 1997
Indian Hills Purification Plant, Eddy County, NM

Dear Mr. Anderson:

This letter constitutes a request pursuant to 3-109 F of the New Mexico Water Quality Control Commission Regulations for modification of the subject discharge plan. As a result of an internal compliance audit it was noted that one discharge source, a pig receiver, and lubricating oil storage were inadvertently omitted from the discharge plan renewal application dated February 11, 1992.

Pigging operations are conducted twice per year. Hydrocarbon-containing liquids discharged from the pig receiver, located in the southwest portion of the plant, are routed to the liquids receiver tank-identified as tank 10 in the '82 discharge plan application and as #3 on the attached plot plan-via underground piping which is pressurized at a maximum of 200 psi. The liquids receiver tank discharges to the tank battery-identified as tanks 14, 15, and 16 in the '82 discharge plan application and as #2 on the attached plot plan. Approximately 27,000 gallons of liquids are discharged from the pig receiver during each pigging operation. When the pigging slug is removed from the barrel of the pig receiver, a drip pan is used to catch any liquids which may drip from the pigging slug. The ground surface beneath the pig receiver is graveled.

Approximately three 55-gallon drums of lubricating oil for the amine pumps are stored at the facility on a concrete pad adjacent to the pumps. Used drums are returned to vendors.

Thank you very much for your attention. Please call Jean Arya of my staff at 241-4954 if you have any questions.

Sincerely,

Toni Ristau
Director, Environmental Services

TKR:po
enclosure

Alvarado Square
Albuquerque, New Mexico 87158

N

Flair Stack

Incoming Power

Plant Waste Storage (10, 10)

Condensate Trap

Waste Water Pump

Acid Gas Line

(12) Actual location

(6) ← TEMPORARY STORAGE

Water Storage From Regenerator (8)

Glycol Storage (5)

Glycol Regenerator

Water Pump

Water Storage (11, 11)

Road

Filter Storage Building

Amine Filter Cases

Charcoal Vessel

Amine & Acid Gas Fin Fans

Flash Tank

Contactor Scrubber

Switch Rack

Surge Tank

Amine–Amine Exchanger

Still

Reflux Pumps

Reflux Accumulator

Glycol Contactor

Tail Scrubber

Inlet & Outlet Gas Pipe Runs

Gas Amine Exchanger

Meter House

DEA Storage (4) DEA Storage (4)

Steamer

Amine Pumps

Transfer Switch

Emergency Generator

Reboiler

(9) Pump Building Waste Storage

(1) Waste Storage

Office Building

Shutdown System

H2S Analyzers

Plant H2S Monitor

Septic Tank

Sweet Gas Meter Run

Inlet Gas Filter Separator Cases

(1) (1) (1) Methanol Storage

Pig Receiver

(3) Liquid Receiver

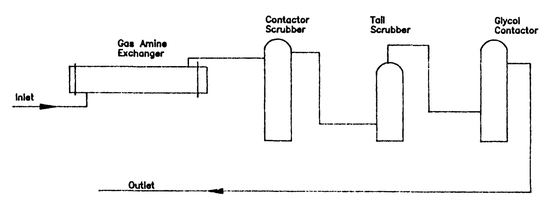
Gas

Liquids

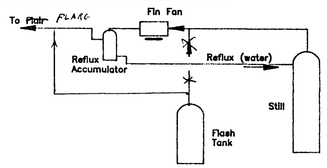
(2) (2) (2) Condensate Custody Transfer

210 Tanks

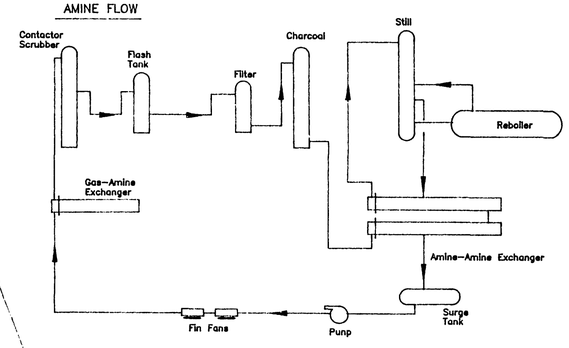
GAS FLOW



ACID FLOW



AMINE FLOW



Process Flow Diagrams

GAS COMPANY OF NEW MEXICO

PURIFICATION PLANT PLOT PLAN

DRAWN BY:	DATE:	REVISED
KEITH TIDWELL	6-23-94	

WILLIAMS FIELD SERVICES
ONE OF THE WILLIAMS COMPANIES

P.O. Box 58900
Salt Lake City, UT 84158-0900
(801) 584-7033
FAX: (801) 584-6483

May 31, 1995

Mr. Roger Anderson
New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87504

Dear Mr. Anderson:

This letter is to notify you that the ownership of the following Sunterra Gas Processing Co. and Gas Company of New Mexico Facilities will be transferred to Williams Field Services (WFS) on or before July 1, 1995:

1. Avalon Natural Gasoline Plant (GW-24);
2. Five Points Compressor Station (GW-78);
3. Wild Horse Compressor Station (GW-79);
4. Indian Hills Purification Plant GW-42);
5. Crouch Mesa Compressor Station GW-129);
6. Kutz Canyon Processing Plant (GW-45); and
7. Lybrook Processing Plant (GW-47).

WFS has received copies of the discharge plans for the above referenced facilities. WFS has reviewed the plans and agrees to abide by the provisions and requirements of each plan.

The following changes apply to all seven (7) discharge plans.

Legally Responsible Party:
Williams Field Services
P.O. Box 58900, M.S. 2G1
Salt Lake City, Utah 84158-0900
(801) 584-6543

Contact Person:
Ms. Leigh E. Gooding, Environmental Specialist
Phone and Address, Same as Above

If you have any questions or require additional information, please do not hesitate to contact me at (801) 584-6543.

Sincerely,

Rob M. Hawksworth
Director, Shared Services

cc: Denny Foust, OCD District III Office

To: ROGER ANDERSON STATE OF NEW MEXICO O.C.D.

Date: Sept. 15, 1992

SUBJECT: TANK INSPECTION AT THE CARLSBAD INDIAN HILLS PURIFICATION PLANT (GAS CO. OF NEW MEXICO)

Roger, on March 17 you visited our Purification plant and made several recommendations. One of them was that the waste tank bottoms would be tested this year with correspondence to you when done.

This was going to be rather difficult with the existing tanks. Instead, a 1/4 inch thick steel liner was set inside of the existing concrete tanks with enough clearance around all four sides to inspect for leakage.

The tanks are checked daily for liquid level. At this time the tanks will be checked for leakage.

Bob Bogan

Bob Bogan

Plant Supv.

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 4/29/92

or cash received on 4/30/92 in the amount of $ 50

from Gas Company of New Mexico

for Indian Hills Gas Plast (GW-42)
(Facility Name) (DP No.)

Submitted by: _____ Date: _____

Submitted to ASD by: Kathy Brown Date: 4/30/92

Received in ASD by: Dorothy C. Montoya Date: 4/30/92

Filing Fee X New Facility ____ Renewal ____

Modification ____ Other _____
(specify)

Organization Code 521.07 Applicable FY 80

To be deposited in the Water Quality Management Fund.

Full Payment ____ or Annual Increment ____

WORKING FUND DRAFT
GAS COMPANY OF NEW MEXICO
4206 3/85

95-27/1070

THIS IS A DRAFT
PLEASE PRESENT FOR PAYMENT PROMPTLY - **VOID AFTER 60 DAYS**

LOCATION Albuquerque | CODE 516. | NO. [redacted]
DATE April 29 1992 | VENDOR CODE | TAX
PURPOSE Filing Fee for Discharge Plan DW-42 Enron Hills Purification Plant, Eddy Cty. $50.00

Molly R. Tenner
AUTHORIZED SIGNATURE

PAY THE SUM OF Fifty Dollars + 00/100

TO THE ORDER OF
NMED - Water Quality Mgmt.
P.O. Box 2088
~~State Land Office Bldg.~~
Santa Fe, NM 87504

ENDORSE ON REVERSE SIDE EXACTLY AS SHOWN OPPOSITE

PAYABLE THROUGH
FIRST NATIONAL BANK IN ALBUQUERQUE
ALBUQUERQUE, NEW MEXICO

[redacted]

6.) stained soils west of flare pit, need to be remediated

7.) Waste water tanks need berms manifold

8.) Triethylene Glycol, ~~the~~ saddle tank evidence of D.I.W. spills, need curb & pad
Also 2 drums next to saddle tank need to be on pad

3/17/92 Yates LaRue Compressor

arrived at 1010 with Roger Anderson, Chris Enstice

met with Chuck Morgan - Yates

Inspection Items:

1.) Leaky connection (spill off pad) on southwest compressor saddle

2.) Curb around tank next to southern most compressor - no pond, curb

3.) Fiberglass sump south of southern compressor, no leaks detected but fluid in secondary liner
Also similar sump at middle compressor bldg.

3/16/92 DS PP Inspection

arrived at 1500 hrs
with Roger Anderson, Chris Enstice

met with Rich Connell - Manager
Mike Wood - Envir. Rep.

Inspection Items:

1.) oil separator at wash rack
needs no leak detection

2.) berms off waste water tank
need at wash rack

3.) Drum storage on pad
needs curb.

Get copy of DS UST reports

3/17/92 Gas Co. Indian Hills Gas Mart

arrived at 0845 with Roger Anderson
Chris Enstice

met with Bob Bogan plant foreman
Gary
Winston Bellard

Inspection Items

1.) Waste concrete sump (north plant)
needs leak detection

2.) Underground line testing?

3.) Drum storage has pad Dec 1993
needs curb

4.) Amine pumps need to fill pad ✓
& curb, has partial pad
& sumps.

5.) flare pit, concrete ✓
No leak detection

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
Ecological Services
Suite D, 3530 Pan American Highway, NE
Albuquerque, New Mexico 87107

March 3, 1992

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

Dear Mr. Lemay:

This responds to the notice of publication received by the U.S. Fish and Wildlife Service (Service) on February 18, 1992, regarding the Oil Conservation Division (OCD) discharge plan applications submitted by El Paso Natural Gas Company and Gas Company of New Mexico on fish, shellfish, and wildlife resources in New Mexico.

The Service has the following comments on the issuance of the following discharge permits.

GW-6 - El Paso Natural Gas Company, Washington Ranch Gas Storage Facility located in Sections 34, T25S, Range 24E, NMPM, Eddy County, New Mexico. Approximately 13,500 gallons per day of dehydrator wastewater is contained in above ground steel tanks prior to disposal in an offsite OCD approved Class II disposal well.

GW-42 - Gas Company of New Mexico, Indian Hills Purification Plant located in NW/4 SW/4, Section 13, T21S, R25E, NMPM, Eddy County, New Mexico. Approximately 66 gallons per day of process waste water is contained in above ground tanks prior to disposal in an OCD approved Class II disposal well.

Dehydrator and process wastewater may contain many organic constituents including benzene, C1 to C5 alkylated benzenes, toluene, and/or polychlorinated bi-phenyls (PCBs). The Service is concerned that these wastewaters may contain any or all of these organic constituents and that accidental spills could result in potential toxicity to Department of the Interior Trust Resources over time.

The Class II disposal wells should be equipped with leak detection. Inspection should be done on a routine basis at a minimum of once every thirty (30) days. A surface soil monitoring program should also be implemented. Groundwater monitoring is recommended where the groundwater depth is found to be less than 100 feet. The El Paso Natural Gas Company well (GW-6) appears to be in the vicinity of several ephemeral springs and possibly the Black River. These areas and other wetland areas should be protected at all times to ensure

the sites will not present a potential threat to endangered species or to migratory birds that may be found in the area.

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

Sincerely,

Jennifer Fowler-Propst
Field Supervisor

cc:
Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico
Regional Administrator, U.S. Environmental Protection Agency, Dallas, Texas
Regional Director, U.S. Fish and Wildlife Service, Fish and Wildlife Enhancement, Albuquerque, New Mexico

Affidavit of Publication

No. 13838

STATE OF NEW MEXICO,

County of Eddy:

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

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

First Publication February 19, 1992

Second Publication

Third Publication

Fourth Publication

Gary D. Scott

Subscribed and sworn to before me this 6th day of March 19 92

Barbara Ann Boans
Notary Public, Eddy County, New Mexico

My Commission expires September 23, 1996

Copy of Publication

LEGAL NOTICE

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan renewal applications have been submitted to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

(GW-6) - El Paso Natural Gas Company, Donald N. Bigbie, Vice President, P.O. Box 1492, El Paso, Texas 79978, has submitted a discharge plan renewal application for their Washington Ranch Gas Storage Facility located in Section 34, Township 25 South, Range 24 East, NMPM, Eddy County, New Mexico. Approximately 13,500 gallons per day of dehydrator wastewater is contained in above ground steel tanks prior to disposal in an OCD approved Class II disposal well. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 80 feet with a total dissolved solids concentration of approximately 1475 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-42) - Gas Company of New Mexico, Paula Y. McAfee, Staff Engineer, P.O. Box 26400, Albuquerque, New Mexico 87125, has submitted a discharge plan renewal application for their Indian Hills Purification Plant located in the NW/4 SW/4, Section 13, Township 21 South, Range 25 East, NMPM, Eddy County, New Mexico. Approximately 66 gallons per day of process waste water is contained in above ground tanks prior to disposal in an OCD approved Class II disposal well. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 180 feet with a total dissolved solids concentration of approximately 3000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 5:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thrity (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held.

A hearing will be held if the Director determines there is significant public interest.

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 13th day of February, 1992.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
s-William J. LeMay
WILLIAM J. LEMAY,
Director

S E A L

Published in the Artesia Daily Press, Artesia, N.M. February 19, 1992.

Legal 13838

NOTICE OF PUBLICATION

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

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Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 aa.m. and 5:00 p.m., Monday through Friday. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held.

A hearing will be held if the Director determines there is significant public interest.

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 13th day of February, 1992.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

S E A L

WILLIAM J. LEMAY, Director

GAS COMPANY OF NEW MEXICO

E.P.

OIL CONSERVATION DIVISION
RECEIVED
'92 FEB 14 AM 9 28

February 11, 1992

Mr. William J. LeMay
Director, State of New Mexico
Energy, Minerals and Natural Resources Department
Oil Conservation Division
PO Box 2088
Santa Fe, New Mexico 87504

Re: Renewal of Discharge Plan Indian Hills Purification Plant

Dear Mr. LeMay:

This letter and attachment constitutes an application for renewal of Waste Water Discharge Plan GW-42, for the Indian Hills Purification Plant, filed May 19, 1987. Please refer to that plan for information regarding plant description and processes, effluent disposal, and site characteristics.

This application will address modifications made since the filing date, including facility modifications and tank berming. Please refer to the attached site plan for locations discussed in this letter. Modifications made since the 1987 filing date include the following:

- Addition of a 90,000 gallon pipeline condensate (liquids) surge tank (tank # 10 on site plan).
- Addition of a 210 barrel tank for plant liquid storage (tank # 1 on site plan).
- Replacement of approximately 50% of underground process piping with above-ground piping.

Storage Tanks
There have been a number of minor changes in storage tanks and locations. For the sake of clarity, the following discussion will describe each storage tank on the site. The tank locations are indicated on the attached site plan. Unless otherwise indicated, all tanks are on grade, bermed, and are constructed of steel. We propose to leave some tanks unbermed as long as their present status remains unchanged. In the event that the status of any of these tanks changes we will reassess the need for tank berming.

- **Tank 1** is used for temporary storage of miscellaneous plant liquids. It is a standard, 210 barrel (8820 gallon) upright oil field tank sitting on a gravel bed. The tank was installed for system redundancy and economic factors. We have not bermed this tank, as there are no automatic or uncontrolled discharges to the tank; an operator is required to pump liquids from other storage locations to this tank.

- **Tank 2** is a standard 210 barrel upright oil field tank installed in 1990 for storage of Diethanol Amine (DEA) used for plant processes. The tank is normally empty; it is used only for temporary storage of DEA while plant equipment repairs are being made. We have not bermed this tank, as it rarely contains liquids.

- **Tank 3** is used for storage of glycols used in the immediately adjacent glycol regenerator. It is a 1000 gallon horizontal tank measuring approximately 3.5 ft by 9 ft, supported on an iron frame approximately 5ft above the ground.

- **Tank 4** is used to store water removed from natural gas. It is a vertical fiberglass tank measuring 4 ft in diameter and 3 ft in height. Most of the water evaporates; from time to time, the tank is pumped out and the liquid transferred to an approved disposal facility, as stated in the discharge plan.

- **Tanks 5, 6, & 7** are used for fresh water storage to supply makeup water for plant processes. Tank 5 is a horizontal tank 6 ft in diameter and 30 ft long supported on steel saddles approximately 1 ft above the ground. Tanks 6 and 7 are 210 barrel upright tanks resting on the ground. These tanks are not bermed, since they contain only fresh water meeting WQCC ground water regulations and thereby pose no threat to ground water.

- **Tanks 8 & 9** are used to store approximately 1200 gallons of DEA for plant process makeup. Both tanks are horizontal tanks measuring approximately 4.5 ft by 10 ft, supported on steel stands approximately 4 ft above the ground.

- **Tank 10** is used for temporary storage of pipeline liquids prior to transferring them to their normal storage location in tanks 14, 15, and 16. This tank is a 90,000 gallon horizontal tank 134 ft long and 11 ft high, supported above-ground. The tank is a sealed pressure vessel rated at 250 psi, equipped with a 250 psi relief valve and a 200 psi pressure alarm. The alarm is monitored 24 hours a day. This tank is not bermed, as it is sealed and equipped with an alarm which is monitored continuously.

- **Tanks 11, 12, & 13** are used to store methanol to control pipeline freezing. They are horizontal tanks supported on metal frames approximately 5 ft above ground. One tank is 10 ft long and 4 ft in diameter; the other two are each 10 ft long and 42 inches in diameter. The larger tank is approximately 650 gallons capacity, and the two smaller tanks each approximately 550 gallons capacity.

- **Tanks 14, 15, and 16** are used for storage of pipeline condensate liquids. They are standard 210 barrel upright oil field tanks. The three tanks are connected to one another by manifolds; each tank is separately enclosed in a 30 ft by 30 ft bermed area. The berming had deteriorated and filled over the years and has recently been reworked to restore each contained area to 1.5 times tank capacity.

Other than as noted in this letter, there have been no significant changes in the facility that are of such a nature as to affect the original discharge plan.

Thank you for your assistance. Please contact me at 880 7966 if I can provide any additional information.

Sincerely,

Paula Y McAfee

Paula Y. McAfee
Staff Engineer

cc:
Steve Emrick - GCNM
Gary Howard - GCNM

GAS COMPANY OF NEW MEXICO

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

July 15, 1987

State of New Mexico
State Land Office Building
P. O. Box 2088
Santa Fe, NM 87501
Attn: Mr. Roger C. Anderson
Environmental Engineer

Dear Mr. Anderson:

Attached is a drawing and location of the charcoal storage pad that will be installed in the first quarter of 1988 as per your request dated July 10, 1987.

If there are any questions please call me at (505) 885-8082 or Robert D. Bogan at (505) 885-6110.

Sincerely,

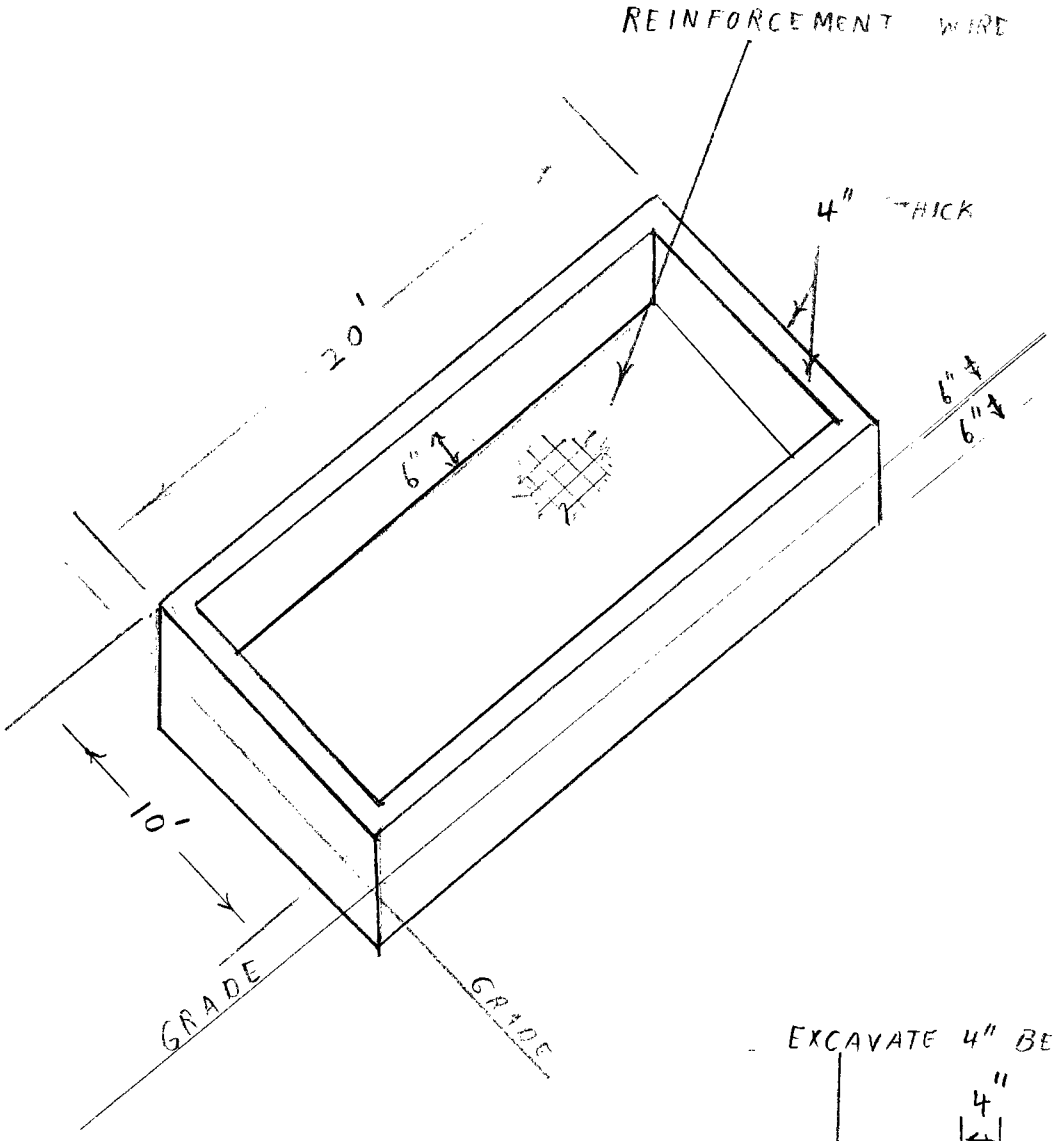
Gary D. Mische
Mgr/Transmission Operations

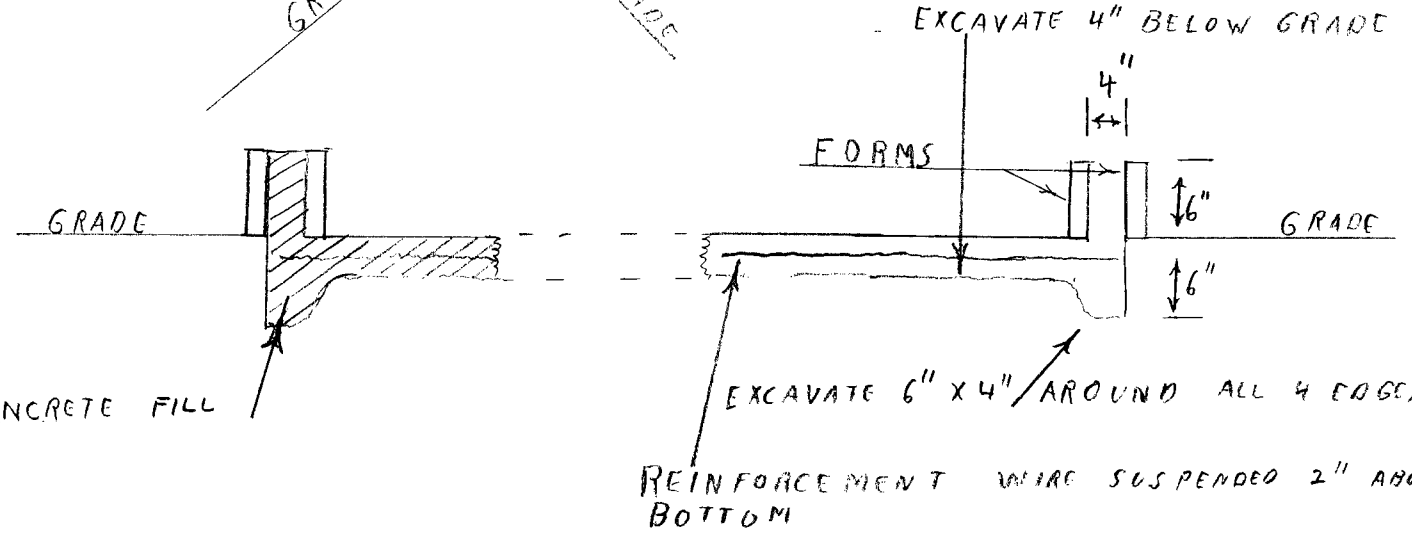
GDM:vr

Enclosure (2)

cc: file (2)

CHARCOAL CONTAINMENT PAN TO BE INSTALLED
1ST QUARTER 1988
GAS CO. NEW MEXICO - PURIFICATION PLANT
CARLSBAD N. MEX.





STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

GARREY CARRUTHERS
GOVERNOR

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-5800

July 10, 1987

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Gary D. Mische
Manager/Transmission Operations
Gas Company of New Mexico
P.O. Box 1419
Carlsbad, NM 88220

RE: Discharge Plan GW-42
Gas Company of New Mexico
Indian Hills Purification Plant

Dear Mr. Mische:

The OCD has received your response to our March 23, 1987 request for additional information. With the information you have provided and the information contained in the original discharge plan application, only one item remains to be resolved.

You stated that spent charcoal and filters will be stored together on the ground in the northwest corner of the plant. Due to the fire hazard of the materials contained in and on the charcoal and filters a curbed concrete pad is required for on-ground storage prior to final disposal. A commitment to construct a pad along with a reasonable timetable for submission of design plans and construction will allow approval of your discharge plan.

If there are any questions or comments, please do not hesitate to call me at (505) 827-5885.

Sincerely,

Roger C. Anderson
Environmental Engineer

cc: OCD - Artesia

P 612 458 645

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to Mr. Gary D. Miesche	
Street and No. P.O. Box 1419	
P.O., State and ZIP Code Carlsbad, NM 88220	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to whom and Date Delivered	
Return receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$
Postmark or Date	

PS Form 3800, Feb. 1982

★ U.S.G.P.O. 1983-403-517

There are "pits" mentioned in paragraph four. Are these the concrete septic tanks mentioned previously? If they are not, and are in fact pits, where are they located? What substances are placed in them? How are they constructed? Is there leak detection?

In paragraph five it is stated that the plant is staffed by two people two days a week and one person five days a week. Paragraph III states that the plant is operated by two men during daylight hours seven days a week. Please explain the discrepancy.

4. Section VII, site characteristics, briefly describes the surface and shallow soil characteristics. What is the depth to groundwater at the site? What is its quality? What is the geology of the materials between the surface and the groundwater? Are there any water wells within one mile of the plant? If so please supply the location, depth, formation, use and quality of the water from available researchable information.

The information requested above is based on an initial review of your application. An inspection of your facility will be scheduled for April. After this inspection, additional information may be requested.

If you have any questions, please do not hesitate to call me at (505) 827-5885.

Sincerely,

Roger C. Anderson
Environmental Engineer

RA/cr

cc: OCD-Artesia

NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following discharge plan has been submitted for approval to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800.

(GW-42) Gas Company of New Mexico, Indian Hills Purification Plant, 311 Moore Drive, Carlsbad, New Mexico 88220, has submitted for approval a ground water discharge plan for the facility located in the NW/4, NW/4, SW/4, Section 13, Township 21 South, Range, 25 East (NMPM), Eddy County, New Mexico. Approximately 66 gallons per day of process waste water is contained in above ground fiberglass tanks or concrete septic tanks prior to disposal in an OCD approved contract injection well. The discharge plan addresses how spills, leaks and other discharges to ground water at the plant site will be managed. Ground water most likely to be affected by any discharge at the surface is at a depth of approximately 180 feet and has an approximate total dissolved solids concentration of up to 3000 mg/l.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and a public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

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

GIVEN Under the Seal of the New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 4th day of March, 1987.

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

SEAL

Journal, March 11, 1987

STATE OF NEW MEXICO }
County of Bernalillo } ss

THOMAS J. SMITHSON

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

for ..... 1 ..... times, the first publication being on the ..... 11 ..... day of ..... March ..... ,198..7....., and the subsequent consecutive publications on ..... ,198.....

..... Thomas J Smithson .....

IAL SEAL
IE MONTOYA
Y PUBLIC - STATE OF NEW MEXICO
Public Filed with Secretary of State
mission Expires 9-15-90

Sworn and subscribed to before me, a Notary Public in and for the County of Bernalillo and State of New Mexico, this ..... 11 ..... day of ..... March ..... ,198 7

PRICE ..... 21.55 .....

Statement to come at end of month.

ACCOUNT NUMBER C 80932

EDJ-15 (R-2/86)

GAS COMPANY OF NEW MEXICO

May 15, 1987

Oil Conservation Division
P. O. Box 2088
State Land Office Building
Santa Fe, NM 87501
Attn: Mr. Roger C. Anderson
Environmental Engineer

Re: Discharge Plan GW-42
Gas Company of New Mexico
Indian Hills Purification Plant

Dear Mr. Anderson:

In response to your letter of the same subject on March 23, 1987 the following is submitted:

1. Enclosed is an affirmation statement which may be added to the application as VIII, Affirmation, page 12.

2. The spent charcoal is stored in the northwest corner of the Plant. There is currently no containment of this charcoal. It is used to filter the rich amine solution, and therefore is saturated primarily with water, diethanolamine, hydrogen sulfide, iron sulfide, and some hydrocarbons. Due to the iron sulfide this charcoal sometimes smolders for a while when it is first dumped out.

   Liquids from the septic tanks are pumped into trucks and then put into a certified disposal well. The disposal well is described in the plan. The septic tanks are buried to just below ground level, they have no leach lines, and are standard 1000 gallon concrete tanks. There is currently no leak detection system or crack inspection beyond what can be done visually when the tanks are dumped out empty.

3. The filters mainly pick up iron sulfide natural gas liquids, and water from the inlet gas stream. When pulled they will be saturated with liquid hydrocarbons, and iron sulfide primarily. In our discussion at the Plant you felt that if the filters were stored at the Plant until the iron sulfide was oxidized that they could then be safely sent to a landfill. We plan to store the filters on site with the charcoal until

P O Box 1419, Carlsbad, New Mexico 88220 505—885-2171

they are no longer reactive.

The "pits" mentioned are the aforementioned septic tanks.

The Plant is staffed by two operators who work ten days on and four days off. Therefore on Tuesdays and Thursdays there are two men at the Plant. There would be on Wednesday's also except one of them works the weekly odd shift at the Avalon Gasoline Plant that day. These men generally work a regular eight hour day, so the Plant is unmanned 16 hours per day. These operators also have duties at the well heads behind the Plant so they are not actually at the Plant for eight hours when they are on duty.

4. During your visit to the Plant site you indicated you thought that all soil and water characteristics could be determined by you from existing data on the geographical area of the Plant.

If there are other questions or clarifications needed please contact either myself at 885-8082 or Bob Bogan at 885-6110.

Sincerely,

Gary D. Mische
Mgr/Transmission Operations

GDM:vr

cc: Bob Bogan
file

VIII. AFFIRMATION

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

Gary D. Mische
Signature

5/15/87
Date

Gary D. Mische
Printed Name of Person Signing

Manager of Transmission Operations
Title

STATE OF NEW MEXICO

ENERGY AND MINERALS DEPARTMENT

OIL CONSERVATION DIVISION

March 23, 1987

GARREY CARRUTHERS
GOVERNOR

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-5800

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Gary D. Mische
Manager/Transmission Operations
Gas Company of New Mexico
P.O. Box 1419
Carlsbad, New Mexico 88220

RE: Discharge Plan GW-42
Gas Company of New Mexico
Indian Hills Purification Plant

Dear Mr. Mische:

The Oil Conservation Division has received and is in the process of reviewing the above referenced discharge plan application. The application was received February 23, 1987.

Additional information is necessary for the review to continue. Please submit the following:

1. The affirmation as it appears in section 1.F of the attached guidelines.

2. Section II.C states that charcoal from the charcoal bed is stored on site. Where is it stored and what method of containment is present to prevent the potential for leaching of contaminants?

   This section also states that liquids are drained and stored for disposal in concrete septic tanks. What is the final disposition of these liquids? Is there a leach field from the septic tanks? Is the liquid transported to a disposal well? What is the design of the septic tanks? How are they installed? At what depth? Is there leak detection incorporated in their installation? Are they periodically inspected for cracks?

3. Section V states filters and all solid wastes are disposed of at the Carlsbad landfill. Which filters? What are the contaminants associated with the filters, if any? Are they appropriate for land fill disposal?

№ 10023

Affidavit of Publication

State of New Mexico,
County of Eddy, ss.

E. C. Cantwell, being first duly sworn, on oath says:

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

March 10, , 19 87

, 19

, 19

, 19

that the cost of publication is $ 24.78, and that payment thereof has been made and will be assessed as court costs.

E C Cantwell

Subscribed and sworn to before me this 18 day of March, 19 87

Donella Taylor

My commission expires 6/01/88
Notary Public

March 10, 1987
NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY AND MINERALS
DEPARTMENT OIL
CONSERVATION DIVISION

Notice is herby given that pursuant of New Mexico Water Quality Control Commission Regulations, the following discharge plan has been submitted for approval to the Director of the Oil Conservation Division, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800;

(GW-42) Gas Company of New-Mexico, Indian Hills Purification Plat, 311 Moore Drive, Carlsbad, New Mexco. 88220, has submitted for approval a ground water discharge plan for the facility located in the NW/4, NW/4, SW/4, Section 13, Township 21 South, Range 25 East (NMPM), Eddy County, New Mexico. Approximately 66 gallons per day of process waste water is contained in above ground fiberglass tanks or concrete septic tanks prior to disposal in an OCD approved contract injection well. The discharge plan addresses how spills, leaks and other discharge to ground water at the plant site will be managed. Ground water most likely to be affected by any discharge at the surface is at a depth of approximately 180 feet and has an approximate total dissolved solids concentration of up to 3000 mg/1.

Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Cnservation Division at the address given above. Prior to ruling on any proposed discharge plan or its modification, the Director of the Oil Conservation Division shall allow at least thirty (30) days after the date of publication of this notice during which comments may be submitted to him and a public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

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

GIVEN Under the Seal of the New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 4th day of March, 1987. To be published on or before March 13, 1987.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

WILLIAM J. LEMAY
Director

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE

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

March 18, 1987

Mr. William J. Lemay
Oil Conservation Division
State of New Mexico
State Land Office Building
P. O. Box 2088
Santa Fe, New Mexico 875042088

Dear Mr. Lemay:

We have reviewed the proposed discharge plan for GW-42 Gas Company of New Mexico. The Indian Hills Purification Plant located at Section 13, Township 21 South, Range 25 East, Eddy County, has submitted a plan to discharge process waste water to a contract injection well. We have not identified any resource issues of concern to our agency from this discharge.

These comments represent the views of the Fish and Wildlife Service. Thank you for the opportunity to review the proposed plan. If you have any questions concerning our comments, please contact Tom O'Brien at (505) 883-7877.

Sincerely yours,

John C. Peterson
Field Supervisor

cc:
Director, New Mexico Department of Game and Fish, Santa Fe New Mexico
Director, New Mexico Health and Environment Department, Environmental Improvement Division, Santa Fe, New Mexico
Regional Adminitrator, Environmental Protection Agency, Dallas, Texas
Regional Director, FWS, FWE, Albuquerque, New Mexico

NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

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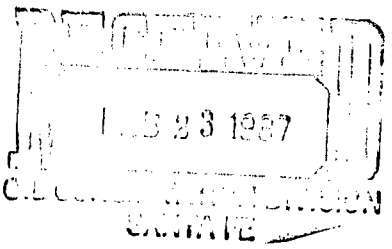
GIVEN Under the Seal of the New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 4th day of March, 1987. To be published on or before March 13, 1987.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

WILLIAM J. LEMAY
Director

S E A L

GAS COMPANY OF NEW MEXICO



February 19, 1987

State of New Mexico
Energy and Minerals Department
Oil Conservation Division
P. O. Box 2088
Santa Fe, NM 87504-2088
Attn: Mr. David G. Boyer

Dear Mr. Boyer:

In order to insure that Gas Company of New Mexico is in compliance with State environmental regulations with regard to the Indian Hills Purification Plant located in Section 13, Township 21 South, Range 25E of Eddy County, a waste water discharge plan is attached for your consideration.

It is our belief that current waste disposal practices at the plant meet all requirements, however upon your recommendations for changes we will extend our utmost cooperation to arrive at a situation which meets your approval.

For further information please contact me at 505-885-8082 or the Plant Manager, Mr. Robert Bogan, at 505-885-6110.

Sincerely,

Gary D. Mische

Gary D. Mische
Mgr/Transmission Operations

GDM:vr

enclosures (2)

cc: file

P O Box 1419, Carlsbad, New Mexico 88220 505—885-2171

GAS COMPANY OF NEW MEXICO
INDIAN HILLS
PURIFICATION PLANT
WASTE WATER DISCHARGE PLAN

SUBMITTED TO:
NEW MEXICO OIL CONSERVATION DIVISION
SANTA FE, NEW MEXICO

SUBMITTED BY:
GAS COMPANY OF NEW MEXICO
EASTERN REGION
TRANSMISSION DEPARTMENT
P. O. BOX 1419
CARLSBAD, NM 88221

I GENERAL INFORMATION

A. Gas Company of New Mexico, Indian Hills Purification Plant
311 Moore Drive
Carlsbad, NM 88220

B. Local Representative
311 Moore Drive
Carlsbad, NM 88220
505-885-8082

C. Location of Plant
The Purification Plant is located approximately five miles NW of Carlsbad, Eddy County, New Mexico. The Plant has the following legal description:

Part of the NW4,NW4,SW4, Section 13, Township 21S, Range 25E, NMPM, containing 9.6 acres.

D. Type of Operation
The Purification Plant uses a regenerative diethanolamine process to remove hydrogen sulfide (H2S) and carbon dioxide (CO2) from a natural gas stream entering the Plant.

II PROCESS DESCRIPTION

A. Terms Used

1. Sour gas - used to describe natural gas that has more than 4.5 PPM hydrogen sulfide (H2S) in that gas.
2. Sweet gas - used to describe natural gas that has less than 4.5 PPM hydrogen sulfide.
3. Amine - a mixture of 20% DEA (diethanolamine) in water.
4. Acid gas - hydrogen sulfide gas after it has been removed from plant process.

B. Gas Stream (See flow sheet in appendix)

The gas that enters the Plant is generally a mixture of two streams, one is sour gas from the Indian Hills Basin, other is sweet gas from other wells in the Pipeline system. The gas co-mingles and goes through the inlet filter It then goes to the inlet scrubber contactor. This contactor is two vessels in one with the bottom section being another liquids separator, and the upper section being the the amine-gas contactor. Any liquids (pipeline condensate) caught in the scrubber section or the inlet filter separator are dumped to three 210 barrel above ground tanks in the southeast corner of the plant yard. Incoming gas goes into the bottom section of this vessel and bubbles up through the DEA and water solution coming down this vessel. It is here that the DEA absorbs the H2S and CO2 and the gas is transformed from sour to sweet gas.

The gas then goes through the tails scrubber where any amine that might have carried over is dumped to the same three 210 barrel tanks.

From the tails scrubber the gas goes through the Glycol Contactor where the gas bubbles up through triethylene glycol. The triethylene glycol captures the water, the water is separated out at the regenerator and is stored in an above ground fiberglass tank for eventual injection into an approved water disposal well.

After the gas leaves the Glycol Contactor it leaves the Plant and goes into a pipeline that feeds the Avalon Processing Plant.

C. DEA Stream (See flow sheet in appendix)

After the DEA captures the H2S in the contactor it flows to the flash tank. Here the pressure is dropped and some of the acid gas (H2S) flashes out of the DEA and water solution.

The DEA then flows through the filter case for particle separation.

After filtration the amine flows through a charcoal bed for further cleaning. The charcoal when removed is stored on site. Liquids drained from the filter case and charcoal case (when changing charcoal or filters) are stored for disposal in two concrete septic tanks north of the Plant.

Upon leaving the charcoal vessels the DEA flows through the amine exchanger where it is warmed prior to entry into the still.

In the still and reboiler the DEA is heated up to 220-230 degrees farenheit and the H2S separates from the DEA.

The DEA then flows through the amine-amine exchanger where it is cooled by the DEA stream going to the still.

From the amine-amine exchanger the DEA flows to the surge tank. Corchek 7406 is injected here in one quart amounts daily as a anti-corrosion filming agent.

From the surge tank the DEA flows to the amine pumps in the pump building. The pumps push the DEA to the fin fan exchangers. Any packing leaks (DEA) or oil leaks in the pumps are caught in a concrete basin and are channeled to a concrete septic tank west of pump building for disposal storage.

The DEA is cooled by forced draft in the fin fan exchangers and heads back to the contactor to do its work again.

D. Acid gas stream (flow sheet in appendix)

After acid gas is released from the DEA in the flash tank and the still, it flows through the fin fans for cooling. The water that condenses out, accumulates in the reflux accumulator, and is pumped back into the still.

Upon leaving the reflux accumulator the acid gas goes into a line heading for the flare stack.

In the line going to the flare stack is a liquid drain point. Any water that condenses out in the line or flare stack is drained to the concrete septic tanks north of the Plant.

The acid gas is then incinerated in a 150 foot tall stack. Quarterly reporting is made to the EID in Santa Fe concerning acid gas flared.

E. Water System

Water is trucked to the Plant by Rowland Trucking Company, it is stored in three tanks north of the office building.

The water is pumped to the steamer where it is added to the re-boiler as steam when makeup is required. Blowdown from the steamer is routed to the concrete septic tanks north of the Plant The water is also routed to the office for use as sanitary water. This water goes to a septic tank east of the office building. Drinking water is bottled water purchased in Carlsbad.

III PLANT OPERATION AND SHUTDOWN SYSTEM

The Purification Plant is operated by two men during normal daylight hours seven days a week. The Plant treats gas 24 hours a day.

The alarm and shutdown system are monitored 24 hours a day via telemetering hookup to the Transmission Gas Control Operator in Carlsbad. Most alarms automatically shut down the Plant.

A loss of liquid in the Plant shuts down the Plant before the capacity of the waste storage pits are surpassed.

IV MATERIALS USED, SUPPLIERS, AMOUNTS USED

Material	Supplier	Amounts Used Annually
Diethanolamine	Coastal Chemical (Odessa, Tx) Gas Treating Chem.(Hobbs, NM) Weskem (Odessa, Tx)	4,500 gal
Triethylene Glycol	Same as Diethanolamine	1,000 gal
Methanol	" "	3,500 gal
Charcoal(Norrit 4x14)	" "	1,071 pd
Corchek 7406	A.C.C.O. (Odessa, Tx)	70 gal
Filters	Bee Line (Odessa, Tx) Thomas Co. (Odessa, Tx)	500
Anti-freeze	Purchased locally	<10 gal

All materials are stored in above ground tanks except for charcoal and filters, these are stored in buildings.

V WASTE MATERIAL AND DISPOSAL

Diethanolamine - Regenerative Process. Diethanolamine is not disposed of except for filter or charcoal changing.

Triethylene glycol-Regenerative Process. Triethylene glycol is not normally disposed of. When it is, it is hauled by Rowland Trucking to a licensed disposal well described later.

Methanol - Methanol is injected into the gas stream to prevent freezing during the Winter months. Methanol remains entrained in the gas and leaves the Plant with the gas.

Charcoal - Spent charcoal is stored on site. Corchek 7406 Corchek stays in the amine stream and is not separated out. Filters and all solid wastes are hauled by T.N.T. disposal to the Carlsbad landfill.

The pump building pit (west of pump building), Plant effluent pit (north of Plant), glycol reneration water (north of glycol regenerator) are hauled by Rowland Trucking Company (Carlsbad) to a licensed disposal well which is described in Section VI. The Plant waste pit has a pump incorporated with it such that the pit can be pumped to an above ground 210 barrel storage tank so that the system can have some redundancy in case of disposal problems.The pipeline condensate which accumulates in the three 210 barrel above ground tanks is hauled to the Navajo Refinery in Artesia for processing into hydrocarbon products. Any water or other liquid that accumulates in the bottom of these tanks is hauled by Rowland Trucking to the disposal well.

The sanitary waste water is handled by the septic tank east of the office building. The Plant is staffed by two people two days a week and one person five days a week. Based on water usage data found in "Design Manual - on-site waste water treatment and disposal systems", USEPA, EPA 625, 1-80-012, October 1980, Table 4-2, Page 54 sanitary water usage is 32 gallons/person/day. Total usage is estimated at 14 gallons per day with 1/3 occupancy. Since the sanitary waste stream is not co-mingled with other streams, the sanitary waste discharge is exempt from the discharge plan review under section 3-105 Part B of the WGCC regulations.

The amount of liquids removed from waste storage pits and hauled to disposal wells is approximately 24,000 gallons annually. ~67(?)

VI INJECTION WELL DATA

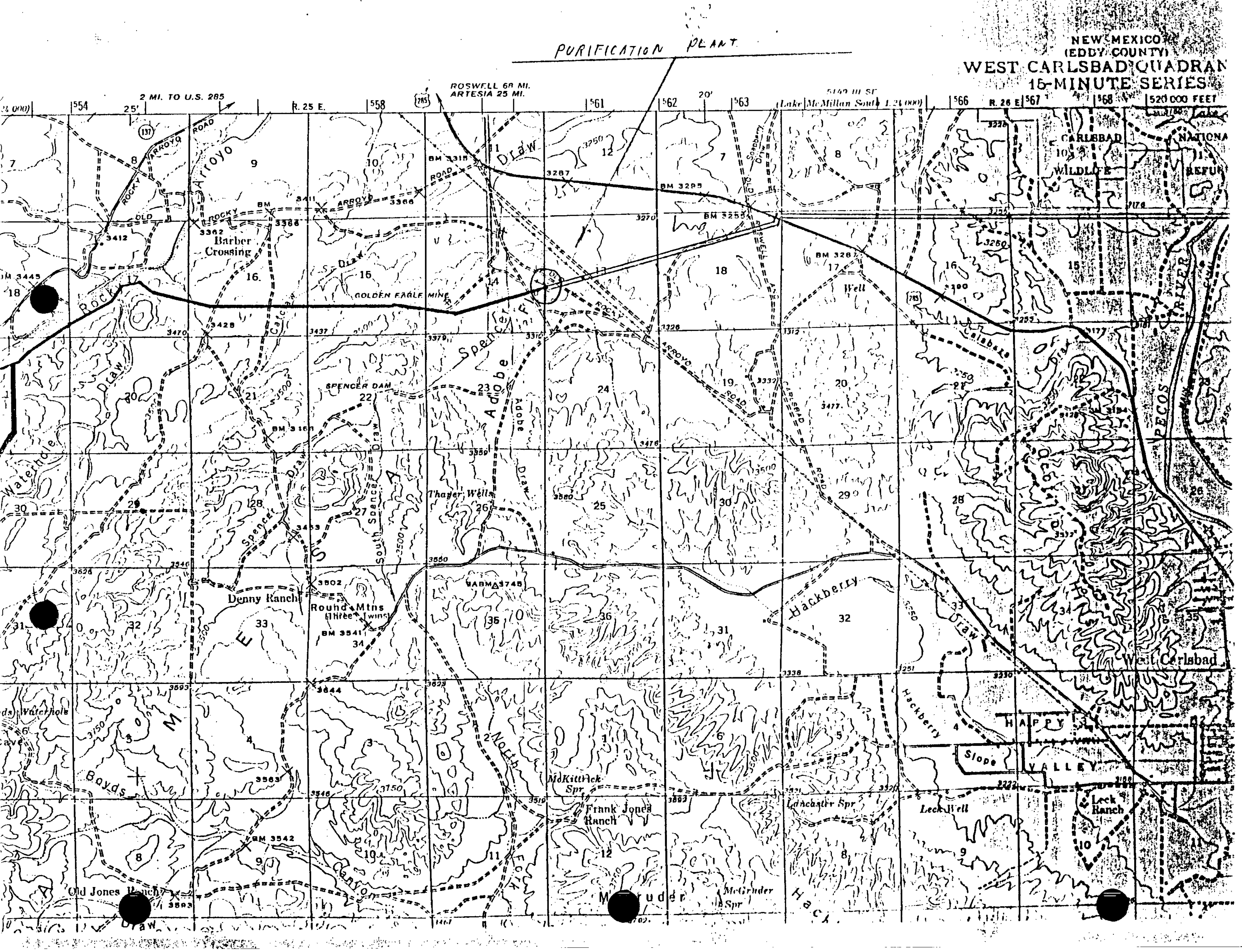
Liquid wastes that are removed from the storage pits described are hauled by Rowland Trucking Company (Carlsbad) to a Class II injected well operated by Unichem International Inc., P. O. Box 1149, Hobbs, New Mexico.
Description and location of well is attached as Appendix D.

VII SITE CHARACTERISTICS

The Plant is located in Adobe Flat, run off water is through Spencer Draw flowing north, north east to the Pecos River bed. The Plant is approximately 100 feet above the river and there are no open bodies of water within one mile of the plant. A soil analysis of June 1986 is attached as Appendix E.

APPENDIX A

USGS MAP


NEW MEXICO
(EDDY COUNTY)
WEST CARLSBAD QUADRAN
15-MINUTE SERIES
PURIFICATION PLANT
2 MI. TO U.S. 285
ROSWELL 68 MI.
ARTESIA 25 MI.
R. 25 E.
R. 26 E.
520 000 FEET
CARLSBAD
WILDLIFE
NATIONA
REFU
ROCKY ARROYO ROAD
Barber Crossing
GOLDEN EAGLE MINE
SPENCER DAM
Thayer Wells
Denny Ranch
Round Mtns (Three Twins)
Waterhole Draw
Hackberry Draw
PECOS RIVER
West Carlsbad
HAPPY VALLEY
Slope
Leck Ranch
Leck Well
Lancaster Spr
McKittrick Spr
Frank Jones Ranch
Old Jones Ranch
McGruder Spr
Boyds Canyon
North Fork
Adobe Draw
Spencer Draw
South Spencer Draw
Calabaza Draw
CARLSBAD ROAD

APPENDIX B

PLOT SHEET

APPENDIX C
MATERIAL SAFETY DATA SHEETS

1. Methanol
2. Diethanolamine
3. Triethylene Glycol
4. Activated Carbon
5. CORCHEK 7406

METHANOL

GRADE

SYNONYMS
METHYL ALCOHOL, WOOD ALCOHOL
CARBINOL

CAS NAME
METHANOL

I.D. NOS./CODES
NIOSH REGISTRY NO. PC1400000

MANUFACTURER/DISTRIBUTOR
E.I. DUPONT DE NEMOURS & CO (INC)

ADDRESS
WILMINGTON, DE 19898

CHEMICAL FAMILY
ALCOHOL

FORMULA
CH3OH

CAS REGISTRY NO.
67-56-1

DUPONT REGISTRY NO.

PRODUCT INFORMATION AND EMERGENCY PHONE
302-774-2421

TRANSPORTATION EMERGENCY PHONE
800-424-9300

PHYSICAL DATA

BOILING POINT, 760MMHG
64.7 DEG C (148.5 DEG F)

SPECIFIC GRAVITY
0.792 AT 20 DEG C (68 DEG F)

VAPOR DENSITY
APPROX. 1.1 (AIR = 1)

% VOLATILES BY VOL.
100%

FORM
LIQUID

APPEARANCE
CLEAR

PH INFORMATION

MELTING POINT
-97.8 DEG C (-144 DEG F)

VAPOR PRESSURE
138 MMHG AT 25 DEG C (77 DEG F)
200 MMHG AT 37.7 DEG C (100 DEG F)

SOLUBILITY IN H2O
100%

EVAPORATION RATE (BUTYL ACETATE = 1) >1

COLOR
COLORLESS

ODOR
FAINT ALCOHOLIC

OCTANOL/WATER PARTITION COEFFICIENT

HAZARDOUS COMPONENTS

MATERIAL(S)
METHANOL

APPROXIMATE %
100

HAZARDOUS REACTIVITY

INSTABILITY
STABLE

INCOMPATIBILITY
REACTS VIGOROUSLY WITH STRONG OXIDIZERS, CHROMIC ANHYDRIDE, LEAD PERCHLORATE, PERCHLORIC ACIDS.

DECOMPOSITION
OCCURS FROM HEAT AND REACTION WITH MATERIALS ABOVE.

POLYMERIZATION
WILL NOT OCCUR

METHANOL * CONTINUED *

FIRE AND EXPLOSION DATA

FLASH POINT	METHOD	AUTOIGNITION TEMPERATURE
11 DEG C (52 DEG F)	TCC	385 DEG C (725 DEG F)

FLAMMABLE LIMITS IN AIR, % BY VOL.
LOWER 6.0%
UPPER 36%

FIRE AND EXPLOSION HAZARDS
FLAMMABLE. FLAME IS INVISIBLE IN DAYLIGHT. METHANOL-WATER MIXTURES WILL BURN UNLESS VERY DILUTE; MIXTURES WITH 25% OR MORE METHANOL ARE DOT CLASS I FLAMMABLE LIQUIDS.

EXTINGUISHING MEDIA
DRY CHEMICAL, CO_2, WATER SPRAY, "ALCOHOL" FOAM.

SPECIAL FIRE FIGHTING INSTRUCTIONS
USE WATER SPRAY TO COOL TANKS OR CONTAINERS.

HEALTH HAZARD INFORMATION

EXPOSURE LIMITS
OSHA 8-HOUR TIME WEIGHTED AVERAGE (TWA) AND ACGIH TLV(R) TWA = 200 PPM, 260 MG/M3. ACGIH ADDS "SKIN" NOTATION.

SIGNIFICANT ROUTES AND EFFECTS OF EXPOSURE
HARMFUL IF INHALED.
MAY BE FATAL OR CAUSE BLINDNESS IF SWALLOWED.
CANNOT BE MADE NONPOISONOUS.
MAY CAUSE IRRITATION.
LD50 (ORAL, RATS) = 12,900 MG/KG; LC50 (RATS, 1 HOUR) = 145,000 PPM.

SAFETY PRECAUTIONS
AVOID CONTACT WITH EYES, SKIN OR CLOTHING.
AVOID PROLONGED OR REPEATED BREATHING OF VAPOR.
WASH THOROUGHLY AFTER HANDLING.

FIRST AID
IF SWALLOWED: INDUCE VOMITING IMMEDIATELY BY GIVING TWO GLASSES OF WATER AND STICKING FINGER DOWN THROAT.

IF INHALED: REMOVE TO FRESH AIR. IF NOT BREATHING, GIVE ARTIFICIAL RESPIRATION; PREFERABLY MOUTH-TO-MOUTH. IF BREATHING IS DIFFICULT, GIVE OXYGEN. CALL A PHYSICIAN.

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

IN CASE OF SKIN CONTACT: FLUSH WITH WATER.

PROTECTION INFORMATION

VENTILATION
GOOD GENERAL VENTILATION SHOULD BE PROVIDED TO KEEP VAPOR CONCENTRATIONS

BELOW EXPOSURE LIMITS.

PERSONAL PROTECTIVE EQUIPMENT

HAVE AVAILABLE AND WEAR WHERE APPROPRIATE: SAFETY SPECTACLES (SIDE SHIELDS PREFERRED), CHEMICAL SPLASH GOGGLES, HARD HAT WITH BRIM, FACE SHIELD (FULL LENGTH), NEOPRENE COATED COTTON GLOVES, SOLVENT RESISTANT GLOVES, RUBBER SAFETY SHOES OR RUBBER OVERSHOES, RUBBER APRON, APPROPRIATE RESPIRATORY PROTECTION (SEE REFERENCE 2, PAGE 4).

OTHER

DISPOSAL INFORMAATION

AQUATIC TOXICITY

TLM 96: > 1000 PPM

SPILL, LEAK OR RELEASE

DIKE LARGE SPILLS. FLUSH SPILL AREA WITH PLENTY OF WATER. DO NOT FLUSH TO SEWER. COMPLY WITH FEDERAL, STATE, AND LOCAL REGULATIONS ON REPORTING RELEASES.

WASTE DISPOSAL

COMPLY WITH FEDERAL, STATE AND LOCAL REGULATIONS. IF APPROVED, INCINERATION, BIO-OXIDATION, SUBSURFACE INJECTION, OR DISPOSAL CONTRACTOR MAY BE USED.

SHIPPING INFORMATION

TRANSPORTATION

DOT HAZARD CLASS.*: FLAMMABLE LIQUID IMCO CLASS.: 3.2

DOT SHIPPING NAME*: METHYL ALCOHOL UN NO.: 1230

NA NO.:

RQ QUANTITY*:

* 49CFR 172.101

SHIPPING CONTAINERS

BARGE, RAILROAD TANK CARS, TANK TRUCKS.

STORAGE CONDITIONS

KEEP AWAY FROM HEAT, SPARKS AND FLAME. KEEP CONTAINER TIGHTLY CLOSED. DO NOT STORE OR MIX WITH STRONG OXIDIZERS, CHROMIC ANHYDRIDE, LEAD PERCHLORATE OR PERCHLORIC ACID. STORE IN ADEQUATELY VENTILATED AREA.

ADDITIONAL INFORMATION AND REFERENCES

REFERENCE 1) DUPONT METHANOL PROPERTIES, USES, STORAGE AND HANDLING BULLETIN.

2) DHEW (NIOSH) PUBLICATION NO. 76-189" A GUIDE TO INDUSTRIAL RESPIRATORY PROTECTION", AVAILABLE FROM DEPT. HHS/NIOSH, 4676 COLUMBIA PARKWAY, CINCINNATI, OH 45226, PHONE 513-684-4287.

EFFECTIVE DATE: 7/82

Form Approved
Budget Bureau No. 44-R1387
Approval Expires April 30, 1971

Form No. 1 SH-0015-4
May 1969

U.S. DEPARTMENT OF LABOR

WAGE AND LABOR STANDARDS ADMINISTRATION
Bureau of Labor Standards

MATERIAL SAFETY DATA SHEET

SECTION I

October, 1971

MANUFACTURER'S NAME	EMERGENCY TELEPHONE NO.
Olin Corporation	(502) 422-2101
ADDRESS (Number, Street, City, State, and ZIP Code) 120 Long Ridge Road, Stamford, Conn. 06904	
CHEMICAL NAME AND SYNONYMS Diethanolamine Di(2-hydroxyethyl)amine 99.5%	TRADE NAME AND SYNONYMS Diethanolamine
CHEMICAL FAMILY Alkanolamine 2,2 NITRIL O DIETHANOL	FORMULA $NH(CH_2CH_2OH)_2$

SECTION II HAZARDOUS INGREDIENTS

PAINTS, PRESERVATIVES, & SOLVENTS	%	TLV (Units)	ALLOYS AND METALLIC COATINGS	%	TLV (Units)
PIGMENTS			BASE METAL		
CATALYST			ALLOYS		
VEHICLE			METALLIC COATINGS		
SOLVENTS			FILLER METAL PLUS COATING OR CORE FLUX		
ADDITIVES			OTHERS		
OTHERS					

~~HAZARDOUS MIXTURES OF OTHER LIQUIDS, SOLIDS, OR GASES~~	%	TLV (Units)
Diethanolamine - IS NOT A HAZARDOUS MATERIAL UNDER CURRENT DEPARTMENT OF LABOR DEFINITIONS.		

SECTION III PHYSICAL DATA

BOILING POINT (°F.)	510°	SPECIFIC GRAVITY (H_2O=1)	1.1 3/4 @
VAPOR PRESSURE (mm Hg.)	Low	PERCENT VOLATILE BY VOLUME (%)	Less 100
VAPOR DENSITY (AIR=1)	None	EVAPORATION RATE (_____=1)	
SOLUBILITY IN WATER	COMPLETELY MISCIBLE		
APPEARANCE AND ODOR	COLORLESS, SL. AMMONIACAL LIQUID		

SECTION IV FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (Method used)	FLAMMABLE LIMITS	Lel	Uel
305° F TAG OPEN CUP	LFL		
EXTINGUISHING MEDIA WATER FOG ALCOHOL FOAM CO2 NOT DETERMINED DRY CHEMICAL			
SPECIAL FIRE FIGHTING PROCEDURES NONE			
UNUSUAL FIRE AND EXPLOSION HAZARDS			

SECTION V HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE: NONE SUGGESTED HAS LOW DEGREE VOLTILITY

EFFECTS OF OVEREXPOSURE: BAD ODOR, IRR OF NOS. & EYES

EMERGENCY AND FIRST AID PROCEDURES

EYE FLUSH W/ WATER 15 MIN GET MED ATTN PROMPTLY

SKIN - FLUSH W/ WATER WASH CONT. CLOTHING BEFORE REUSE

INHALATION: NO PROBLEM LIKELY GET MED ATTN IF PROB DEVE

INGESTION: INDUCE VOM IF LARGE AMT ARE SWALLED & CALL DR.

NOTE TO PHY NO SPEC ANTIDOTE KNOWN TREATMENT DEPENDS ON THE JUDGMENT OF PHY & INDIV CONDITION OF THE PATIENT.

SECTION VI REACTIVITY DATA

STABILITY: STABLE UNDER NORM	UNSTABLE		CONDITIONS TO AVOID:
	STABLE	✓	IGNITE IN AIR AT 1224° F

INCOMPATABILITY (Materials to avoid)

HAZARDOUS DECOMPOSITION PRODUCTS

HAZARDOUS POLYMERIZATION	MAY OCCUR		CONDITIONS TO AVOID
	WILL NOT OCCUR	✓	

SECTION VII SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED: ABS MATERIAL OR SAND SCOOP INTO DRUMS USE PROPER PROTECTIVE EQUIP.

WASTE DISPOSAL METHOD: BURN ACCORDING TO ALL STATE & LOCAL REGULATIONS

SECTION VIII SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION (Specify type): ~~FULL FACE MASK CHEMICAL~~ SUFF TO CONTROL VAPORS TO PEL/TLV LEVEL

VENTILATION	LOCAL EXHAUST	SPECIAL
	MECHANICAL (General)	OTHER

PROTECTIVE ~~GLOVES~~ CLEAN SKIN CLOTHING

EYE PROTECTION: CHEM WORKERS GOGGLES

OTHER PROTECTIVE EQUIPMENT

SECTION IX SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING

OTHER PRECAUTIONS

INGESTION: LOW SINGLE DOSE ORAL TOXIC.
LD 50 (GUINEA PIGS) IN THE RANGE OF
2000 MG / KG

EST. FROM THIS DATA LETHAL DOSE FOR A
100 # PERSON MAY BE IN THE RANGE
OF 2 oz.

EYE CONTACT: A BURN

SKIN CONTACT: SINGLE SHORT CONTACT: NO IRRITATION
REPEATED PROLONGED EXPOSURE: UP TO MODERATE
IRRITATION, EVEN A MINOR BURN.

SKIN DESORBTION: NONE IN TOXIC AMTS

EFFECTS OF OVER EXPOSURE: BAD ODOR &
IRRITATION OF NOSE & EYES.

DOW CHEMICAL U.S.A. MIDLAND MICHIGAN 48640 EMERGENCY PHONE: 517-636-4400

EFFECTIVE DATE: 31 MAY 78 PRODUCT CODE: 87792

PRODUCT NAME: TRIETHYLENE GLYCOL - TECHNICAL MSD: 0271

INGREDIENTS (TYPICAL VALUES-NOT SPECIFICATIONS)	%
TRIETHYLENE GLYCOL	99

SECTION 1 PHYSICAL DATA

BOILING POINT: 545.9F : SOL. IN WATER: COMPLETELY MISCIBLE
VAP PRESS: 1.0 MMHG @ 20C : SP. GRAVITY: 1.1 @ 25/25C
VAP DENSITY (AIR=1): 5.18 : % VOLATILE BY VOL: NOT APPLICABLE
APPEARANCE AND ODOR: COLORLESS LIQUID, MILD ODOR.

SECTION 2 FIRE AND EXPLOSION HAZARD DATA

FLASH POINT: 350F : FLAMMABLE LIMITS (STP IN AIR)
METHOD USED: PENSKY-MARTENS C.C. : LFL: 0.9% UFL: 9.2%
EXTINGUISHING MEDIA: WATER FOG, ALCOHOL FOAM, CO2, DRY CHEMICAL.
SPECIAL FIRE FIGHTING EQUIPMENT AND HAZARDS: ----

SECTION 3 REACTIVITY DATA

STABILITY: WILL IGNITE IN AIR AT 700F.
INCOMPATIBILITY: OXIDIZING MATERIAL.
HAZARDOUS DECOMPOSITION PRODUCTS: ----
HAZARDOUS POLYMERIZATION: WILL NOT OCCUR.

SECTION 4 SPILL, LEAK, AND DISPOSAL PROCEDURES

ACTION TO TAKE FOR SPILLS (USE APPROPRIATE SAFETY EQUIPMENT): FOR LARGE SPILLS, USE CONTAINMENT DIKE TO PREVENT WATER POLLUTION. RECOVER WITH VACUUM TRUCK. SMALL AMOUNTS CAN BE SOAKED UP WITH ABSORBENT MATERIAL AND SHOVELED INTO DRUMS. WASH DOWN REMAINING SMALL AMOUNT WITH WATER.
DISPOSAL METHOD: RECOVER LARGE QUANTITIES BY REPROCESSING OR BURN ACCORDING TO LOCAL LAWS.

SECTION 5 HEALTH HAZARD DATA

INGESTION: VERY LOW IN SINGLE DOSE ORAL TOXICITY; LD50 LAB ANIMALS RANGE

(CONTINUED ON PAGE 2)

DOW CHEMICAL U.S.A. MIDLAND MICHIGAN 48640 EMERGENCY PHONE: 517-636-4400

PRODUCT CODE: 67792

EFFECTIVE DATE: 31 MAY 78 MSD: 0271

PRODUCT (CONT'D): TRIETHYLENE GLYCOL - TECHNICAL

SECTION 5 HEALTH HAZARD DATA (CONTINUED)

INGESTION: (CONTINUED)
FROM 8000 TO 16800 MG/KG.
EYE CONTACT: ESSENTIALLY NO IRRITATION AND NO CORNEAL INJURY.
SKIN CONTACT: ESSENTIALLY NO IRRITATION.
SKIN ABSORPTION: NOT CONSIDERED TO BE A PROBLEM BECAUSE OF ITS LOW SINGLE DOSE TOX.
INHALATION: NO GUIDE FOR CONTROL KNOWN.
EFFECTS OF OVEREXPOSURE: ----

SECTION 6 FIRST AID--NOTE TO PHYSICIAN

FIRST AID PROCEDURES:

EYES: IRRIGATION OF THE EYE IMMEDIATELY WITH WATER FOR FIVE MINUTES IS GOOD SAFETY PRACTICE. CONSULT MEDICAL.
SKIN: WASH OFF IN FLOWING WATER. DECONTAMINATE CLOTHING AND ACCESSORIES BEFORE REUSE. GOOD PERSONAL HYGIENE.
INHALATION: NO EFFECT EXPECTED.
INGESTION: INDUCE VOMITING. CONSULT MEDICAL.

NOTE TO PHYSICIAN:
EYES: STAIN FOR EVIDENCE OF CORNEAL INJURY.
GENERAL: HUMAN EFFECTS NOT ESTABLISHED. PROBABLY WOULD PRODUCE NO MORE THAN MILD ILLNESS WITH SPONTANEOUS RECOVERY. BASED ON MINIMAL DATA.

SECTION 7 SPECIAL HANDLING INFORMATION

VENTILATION: GOOD ROOM VENTILATION USUALLY ADEQUATE FOR MOST OPERATIONS.
RESPIRATORY PROTECTION: NONE LIKELY TO BE REQUIRED.
PROTECTIVE CLOTHING: CLEAN CLOTHING.
EYE PROTECTION: SAFETY GLASSES WITHOUT SIDE SHIELDS.

SECTION 8 SPECIAL PRECAUTIONS AND ADDITIONAL INFORMATION

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE: PRACTICE REASONABLE CARE TO AVOID EXPOSURE.

ADDITIONAL INFORMATION: ----

LAST PAGE

Witco Chemical

File No.

MATERIAL SAFETY DATA SHEET

N.F.P.A.

(Approved by U.S. Department of Labor "Essentially Similar" to Form LSB-OOS-4)

Information on this form is furnished solely for the purpose of compliance with the Occupational Safety and Health Act of 1970 and shall not be used for any other purpose. Use or dissemination of all or any part of this information for any other purpose or purposes is illegal.

PRODUCT Activated Carbon

PRODUCT SECTION I

MANUFACTURER'S NAME	EMERGENCY TELEPHONE NO.
Witco Chemical Corporation - Inorganic Specialties Div.	412-756-2910
ADDRESS (Number, Street, City, State, and ZIP Code) Highway 268 Petrolia, Pa. 16050	
CHEMICAL NAME AND SYNONYMS Activated Carbon, Activated Charcoal	TRADE NAME AND SYNONYMS Activated Carbon, Witcarb™
CHEMICAL FAMILY Amorphous Carbon	FORMULA Carbon atoms in crystallite structure with indefinite molecular weight.

SECTION II HAZARDOUS INGREDIENTS

INGREDIENT	%	TLV (UNITS)	INGREDIENT	%	TLV (UNITS)
None					
	-	—	—	—	—

HAZARDOUS MIXTURES OF OTHER LIQUIDS, SOLIDS, OR GASES	%	TLV (UNITS)
Activated Carbon that has adsorbed flammable liquids or gases must		
be laboratory checked for ignition temperature when expended.		

SECTION III – PHYSICAL DATA

BOILING POINT (°C)	N/A	SPECIFIC GRAVITY (H2O = 1) Apparent Density	.40-.50
VAPOR PRESSURE (mm Hg.)	N/A	PERCENT VOLATILE BY VOLUME (%)	None
VAPOR DENSITY (AIR = 1)	N/A	EVAPORATION RATE (= 1)	None
SOLUBILITY IN WATER	insoluble		
APPEARANCE AND ODOR Odorless, black, granular solid		Ignition Temperature ~ 410°C	

SECTION IV FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (METHOD USED) None	FLAMMABLE LIMITS Ignition Point (above)	LEL	UEL

EXTINGUISHING MEDIA Use media for class A fires; foam, multipurpose dry chemical and water type extinguishers.

SPECIAL FIRE FIGHTING PROCEDURES None

UNUSUAL FIRE AND EXPLOSION HAZARDS Provide for the handling of dry flowing solids in grounded equipment to prevent build up of static electric charge especially when explosive dust of vapor mixtures may exist in confined areas. Also provide for pressure relief devices following the principles set forth in the National Fire Protection Assoc. Explosion Venting Guide NFPS 68-1954.

SECTION V [illegible] DATA

THRESHOLD LIMIT VALUE: Avoid exposure to dust levels above 15 mg per cubic meter

EFFECTS OF OVEREXPOSURE: Temporary duress to mucous membrane causing coughing and minor nose and throat irritation.

EMERGENCY AND FIRST AID PROCEDURES: Wash mouth with water - no other treatment required. Use protective respiratory equipment to avoid inhaling carbon dust.

SECTION VI REACTIVITY DATA

STABILITY: Inert	UNSTABLE		CONDITIONS TO AVOID: Activated Carbon is chemically inert
	STABLE	X	

INCOMPATABILITY (MATERIALS TO AVOID): None

HAZARDOUS DECOMPOSITION PRODUCTS: None

HAZARDOUS POLYMERIZATION	MAY OCCUR		CONDITIONS TO AVOID: None
	WILL NOT OCCUR	X	

SECTION VII SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED: Spills can create nuisance dust and housekeeping problems. Vacuuming is best clean up procedure.

WASTE DISPOSAL METHOD: Spent Activated Carbon is best disposed of by land-fill

SECTION VIII SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION (SPECIFY TYPE): Respiratory classification table G-2, part 1910, 93, (OSHA) Rules and Regulations

PROTECTIVE GLOVES: None required		EYE PROTECTION: For airborne dust	
VENTILATION	LOCAL EXHAUST: Vacuum to control dust		SPECIAL
	MECHANICAL (GENERAL)		OTHER

OTHER PROTECTIVE EQUIPMENT: Protective respiratory equipment should be worn during handling to protect against air dust.

SECTION IX SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING: Packaged Activated Carbon is not resistant to outside storage, and requires indoor Type I and Type II storage facilities, Paragraph 1910.177 (OSHA)

OTHER PRECAUTIONS: Check oxygen content of atmosphere of any vessel containing Activated Carbon before allowing entry of personnel.

Date Issued 12-9-75 Supplier's Signature E. M. Lafferty Jr.

Title Technical Director Company Inorganic Specialties Division, Witco Chemical

RETURN TO

Name

Company

Address

Occupational Safety and Health Administration

MATERIAL SAFETY DATA SHEET

Required under USDL Safety and Health Regulations for Ship Repairing, Shipbuilding, and Shipbreaking (29 CFR 1915, 1916, 1917)

SECTION I

MANUFACTURER'S NAME	EMERGENCY TELEPHONE NO.
A. C. C. O., INC.	915-362-5751
ADDRESS (Number, Street, City, State, and ZIP Code)	3040 Lakeview Dr. Odessa, Texas 79762
CHEMICAL NAME AND SYNONYMS	TRADE NAME AND SYNONYMS: CORCHEK 7406
CHEMICAL FAMILY: Proprietary	FORMULA

SECTION II - HAZARDOUS INGREDIENTS

PAINTS, PRESERVATIVES, & SOLVENTS	%	TLV (Units)	ALLOYS AND METALLIC COATINGS	%	TLV (Units)
PIGMENTS			BASE METAL		
CATALYST			ALLOYS		
VEHICLE			METALLIC COATINGS		
SOLVENTS			FILLER METAL PLUS COATING OR CORE FLUX		
ADDITIVES			OTHERS		
OTHERS					

HAZARDOUS MIXTURES OF OTHER LIQUIDS, SOLIDS, OR GASES	%	TLV (Units)

SECTION III - PHYSICAL DATA

BOILING POINT (°F.)		SPECIFIC GRAVITY (H_2O=1)	0.962
VAPOR PRESSURE (mm Hg.)		PERCENT, VOLATILE BY VOLUME (%)	
VAPOR DENSITY (AIR=1)		EVAPORATION RATE (Ether =1)	>1
SOLUBILITY IN WATER	Soluble		
APPEARANCE AND ODOR	Amber to Brown Liquid		

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (Method used)	FLAMMABLE LIMITS	Lel	Uel

EXTINGUISHING MEDIA: Water spray, dry chemical, or carbon dioxide

SPECIAL FIRE FIGHTING PROCEDURES: Wear self-contained breathing apparatus. Dilute rapidly with large volumes of water

UNUSUAL FIRE AND EXPLOSION HAZARDS: Produces toxic fumes when burned

(Continued on reverse side)

SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE: Not available

EFFECTS OF OVEREXPOSURE: Liquid is corrosive to the eyes and skin. Harmful if ingested or absorbed through skin.

EMERGENCY AND FIRST AID PROCEDURES: Flush eyes or skin with water for 15 minutes and call a physician. If ingested drink large amounts of water and call a physician. Launder clothes before reuse.

SECTION VI - REACTIVITY DATA

STABILITY	UNSTABLE		CONDITIONS TO AVOID
	STABLE	X	

INCOMPATABILITY (Materials to avoid): Avoid contact with strong oxidizing agents.

HAZARDOUS DECOMPOSITION PRODUCTS: Produces toxic oxides of nitrogen and HCl when burned.

HAZARDOUS POLYMERIZATION	MAY OCCUR		CONDITIONS TO AVOID
	WILL NOT OCCUR	X	

SECTION VII - SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED: Wash down with water or soak up on sand and dispose of in an approved landfill. DO NOT wash down with water where runoff will contaminate important water sources.

WASTE DISPOSAL METHOD: Incenerate in an incenerator with an afterburner and scrubber and bury in an approved landfill.

SECTION VIII - SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION (Specify type): Use with adequate ventilation

VENTILATION	LOCAL EXHAUST		SPECIAL
	MECHANICAL (General)	Yes	OTHER

PROTECTIVE GLOVES: Rubber

EYE PROTECTION: Face shield and chemical goggles

OTHER PROTECTIVE EQUIPMENT: Rubber boots and apron if possibility of contact during use.

SECTION IX - SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING: Avoid contact with eyes, skin and clothing. Avoid breathing mist.

OTHER PRECAUTIONS: Do not transfer to improperly marked containers. Keep container closed when not in use.

APPENDIX D

INJECTION WELL DATA

ROWLAND TRUCKING COMPANY

A DIVISION OF

EUNICE RENTAL TOOL COMPANY

P.O. BOX 127

CARLSBAD, NEW MEXICO 88220

PHONES
[505] 885-2053
885-6871

DIRECT LINE PHONE
[505] 393-5807

September 20, 1984

Gas Co. of New Mexico

311 Moore Drive

Carlsbad, New Mexico 88220

Sir:

Attached is the copy of the legal description of our salt water disposal well that is utilized to dispose of the fluid hauled away from your Avalon Gas Plant and, also, your Amine Plant.

There may be times that we take the fluid to our Rattlesnake SWD # 1 so, I have also attached the legal on it.

If I can furnish you with any further information, just call us.

Yours Truly
Rowland Trucking Co.

B. J. Brown

Unichem International, Inc.
P. O. Box 1149
Hobbs, New Mexico 88240

General information:

Springs Unit Salt Water Disposal Well

Location:

Unit Letter I, 1650' from the South line and 754' from the east line; Section 27, Township 20 South, Range 26 East.

Bone Springs Formation

Elevation 3221' GL

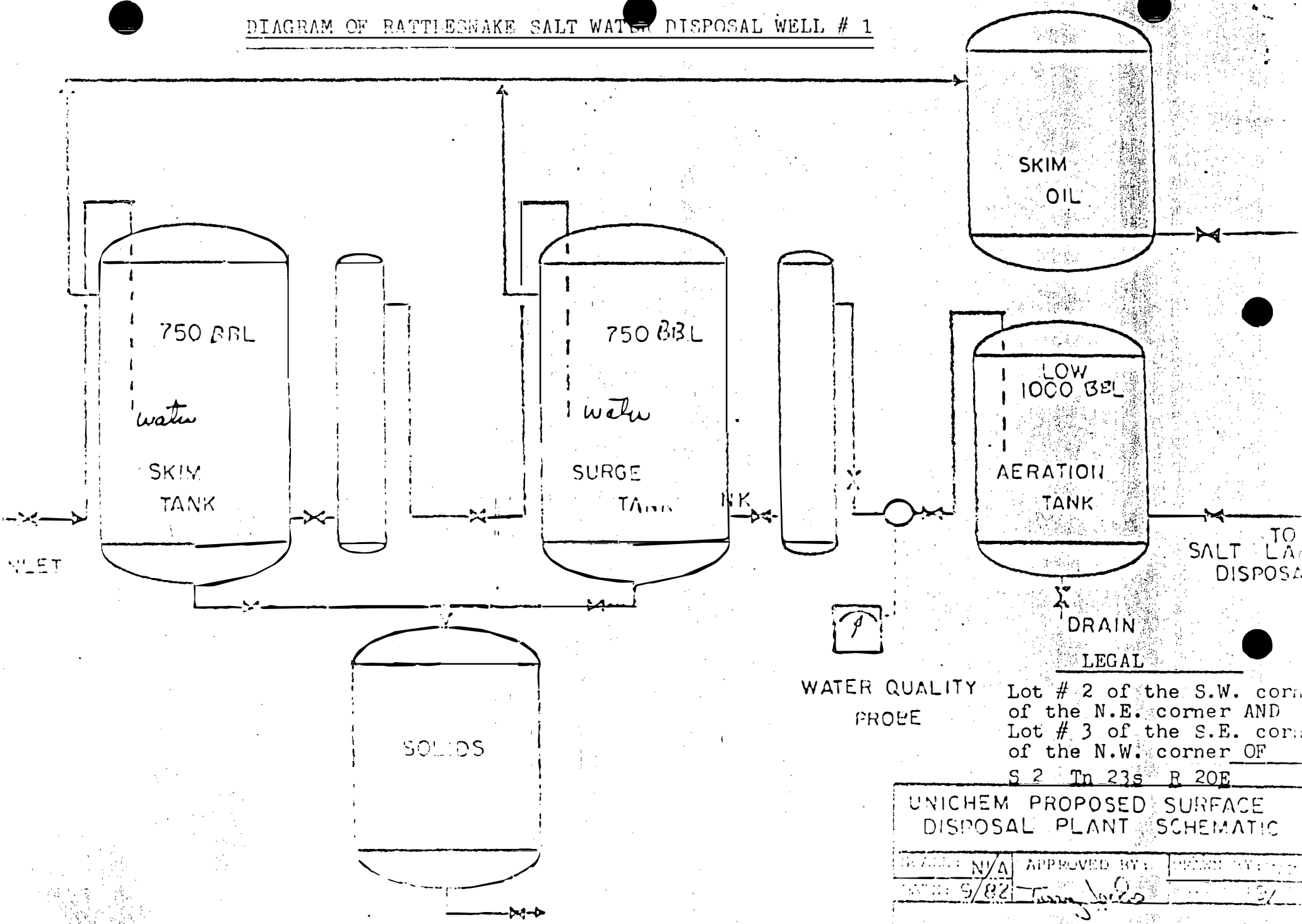
Converted plugged and abandoned well to Salt Water Disposal Service as authorized by New Mexico Oil Conservation Commission Order No. SWD-86

Proceedure:

Drill out cement plugs, cut off 13 3/8 & 8 5/8 casing. Insert casing nipple and 8 5/8 head. Drilled out to 4580', ran tubing to bottom. Ran Guiberson type AF tension packer on 85 joints of 2 3/8 OD EUE 8rt 4.70# J-55 tubing with PA-600 plastic coating. Bottom of packer set at 2661'. Completed conversion 12-12-68.

Administrative #
entered for R-#
R#

DIAGRAM OF RATTLESNAKE SALT WATER DISPOSAL WELL # 1



LEGAL

Lot # 2 of the S.W. corn
of the N.E. corner AND
Lot # 3 of the S.E. corn
of the N.W. corner OF
S 2 Tn 23s R 20E

UNICHEM PROPOSED SURFACE DISPOSAL PLANT SCHEMATIC

SCALE: N/A APPROVED BY:

DATE: 9/82

(4) That the State Engineer has designated, pursuant to Section 65-3-11 (15), N.M.S.A., 1953 Compilation, all underground water in the State of New Mexico containing 10,000 parts per million or less of dissolved solids as fresh water supplies to be afforded reasonable protection against contamination; except that said designation does not include any water for which there is no present or reasonably foreseeable beneficial use that would be impaired by contamination.

(5) That the applicant, Unichem International, Inc., seeks as an exception to the provisions to the aforesaid Order (3) to permit the commercial disposal of produced brine into several unlined surface pits (natural salt lakes) located in Section 2, Township 23 South, Range 29 East, NMPM, Eddy County, New Mexico.

(6) That the applicant proposes to dispose of up to 2000 barrels of salt water daily at company facilities located in the NW/4 of said Section 2, such salt water being hauled by Unichem or Unichem subsidiary trucks only.

(7) That there appears to be no shallow fresh water in the vicinity of the subject pits for which a present or reasonably foreseeable beneficial use is or will be made that would be impaired by contamination from the subject pits.

(8) That the area of the salt lakes is sufficient to provide for evaporation in excess of the volume of salt water proposed for disposal (up to 2000 barrels of water per day).

(9) That the disposal facility should consist of skim tanks, surge tanks, aeration tanks, skim oil storage tanks and a header pit all being of sufficient size and capacity to prevent the movement of any oil or solids onto or into any of the salt lakes affected by such disposal.

(10) That if the applicant fails to prevent the movement of such oils or solids onto or into any of said salt lakes, the Director of the Division should be empowered to administratively suspend or rescind the authority for use of such pits for salt water disposal.

(11) That this application should be approved.

IT IS THEREFORE ORDERED:

(1) That the applicant, Unichem International, Inc., is hereby granted an exception to Order (3) of Division Order No. R-3221, as amended, to dispose of up to 2000 barrels of salt water per day collected by its or its subsidiaries' trucks

in a commercial salt water disposal facility located in the NW/4 of Section 2, Township 23 South, Range 29 East, NMPM, Eddy County, New Mexico.

(2) That prior to disposal of any water at said facility, the applicant shall install skim tanks, surge tanks, aeration tanks, and skim oil storage tanks and shall construct a header pit all of combined size and capacity sufficient to prevent the movement of any oil or solids from the facility onto or into any natural salt lake or ground surface which may be affected by the disposal operation.

(3) That upon completion of such installation and construction the applicant shall notify the supervisor of the Division's district office at Artesia in order that the Division may inspect said facility.

(4) That the Director of the Division may by administrative order suspend or rescind such authority whenever it reasonably appears to the Director that such suspension or rescission would serve to protect fresh water supplies from contamination or if the applicant should permit the movement of oil or solids onto the ground surface or any natural salt lake as prohibited by Order No. (2) above.

(5) The applicant shall file a monthly report of disposal volumes on Form C-120-A in accordance with Division Rule 1120.

(6) That jurisdiction of this cause is retained for the entry of such further orders as the Division may deem necessary.

DONE at Santa Fe, New Mexico, on the day and year hereinabove designated.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

JOE D. RAMEY
Director

S E A L
fd/

APPENDIX E

SOIL TEST DATA

Danny R Anderson, Consultants

GEOTECHNICAL ENGINEERS
2525 EAST YANDELL DR
EL PASO, TEXAS 79903
(915) 532-7566

REPORT OF BORING NUMBER 1

PROJECT 90,000 Gallon Propane Tank

LOCATION Carlsbad, New Mexico

Description of Materials	Symbol	Depth, feet	Cores	Elevation	Standard Penetration Blows per 6 inches 1st	2nd	3rd	Liquid Limit	Plasticity Index	Moisture Content	Unified Soil Classification
SAND, fine, clayey, tan, dense, dry, calcareous											
SILT, potash, pink-white, hard, dry					100(6")					23.1	SC
								41	7	20.4	ML
Auger refusal at 5 feet		5									
		10									
		15									
		20									
		25									
		30									

Type and make of drill Mobile Drill Company Model B52/61 with 8¼" o.d. continuous flight hollow stem auger

Driller Jesus Espana

Logger Danny R. Anderson, P.E.

REMARKS

Date boring started 6/19/86

Date boring completed 6/19/86

Surface elevation Not available

Groundwater elevation Not encountered

Danny R Anderson, Consultants

GEOTECHNICAL ENGINEERS
2525 EAST YANDELL DR
EL PASO, TEXAS 79903
(915) 532-7566

REPORT OF BORING NUMBER 2

PROJECT 90,000 Gallon Propane Tank

LOCATION Carlsbad, New Mexico

Description of Materials	Symbol	Depth, feet	Cores	Elevation	Standard Penetration Blows per 6 inches 1st	2nd	3rd	Liquid Limit	Plasticity Index	Moisture Content	Unified Soil Classification
SAND, fine, clayey, tan, poorly graded, dense, dry, calcareous					6	16	50 (2")	36	18	11.3	SC
SILT, potash, pink-white, hard, dry		5						--	--	--	
Auger refusal at 5 feet		10 15 20 25 30									

Type and make of drill Mobile Drill Company Model B52/61 with 8½" o.d. continuous flight hollow stem auger

Driller Jesus Espana

Logger Danny R. Anderson, P.E.

REMARKS

Date boring started 6/19/86

Date boring completed 6/19/86

Surface elevation Not available

Groundwater elevation Not encountered

Danny R Anderson, Consultants

GEOTECHNICAL ENGINEERS
2525 EAST YANDELL DR
EL PASO, TEXAS 79903
(915) 532-7566

DATE

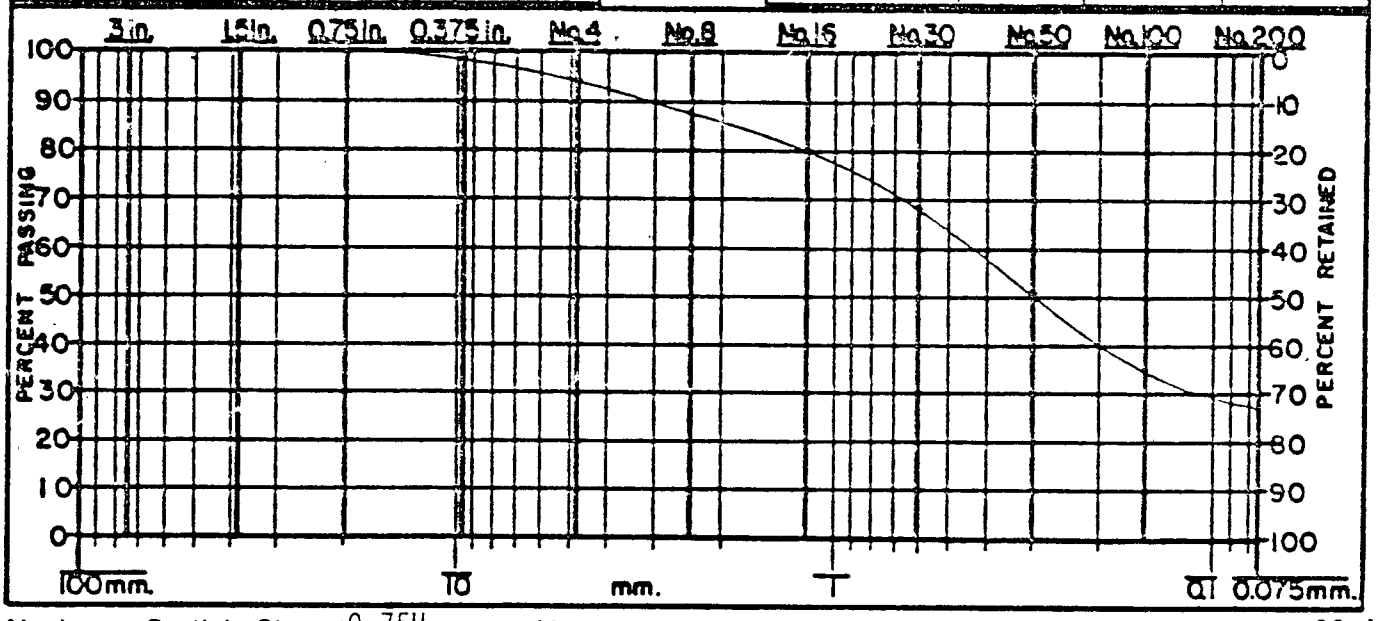
PROJECT 90,000 Gallon Propane Tank

REPORT OF TEST ON Clayey sand (SC)

RECEIVED FROM Boring Number 1 at 2½ foot depth

REPORT OF PARTICLE SIZE ANALYSIS

SIEVE SIZE	CUM. WT. RETAINED	PERCENT PASSING	PERCENT RETAINED
75 mm. (3 in.)			
38.1 (1.5)			
19.0 (0.75)	0	100	0
9.5 (0.375)	2.4	98	2
4.75 (No. 4)	6.9	93	7
2.36 (No. 8)	12.8	87	13
1.18mm. (No.16)	19.5	80	20
0.60 (No.30)	32.3	68	32
0.30 (No.50)	48.9	51	49
0.15 (No.100)	64.5	35	65
0.075 (No.200)	72.7	27	73



Maximum Particle Size -0.75" Liquid Limit _____ Plasticity Index _____ Moisture Content 23.1%

This report covers laboratory procedures in accordance with ASTM D 2487, D 2217, D422, D423, D424 & D2216.

REMARKS:

COPIES TO

LABORATORY NO

FILE NO 86080

Danny R Anderson, Consultants

GEOTECHNICAL ENGINEERS
2525 EAST YANDELL DR
EL PASO, TEXAS 79903
(915) 532-7566

DATE

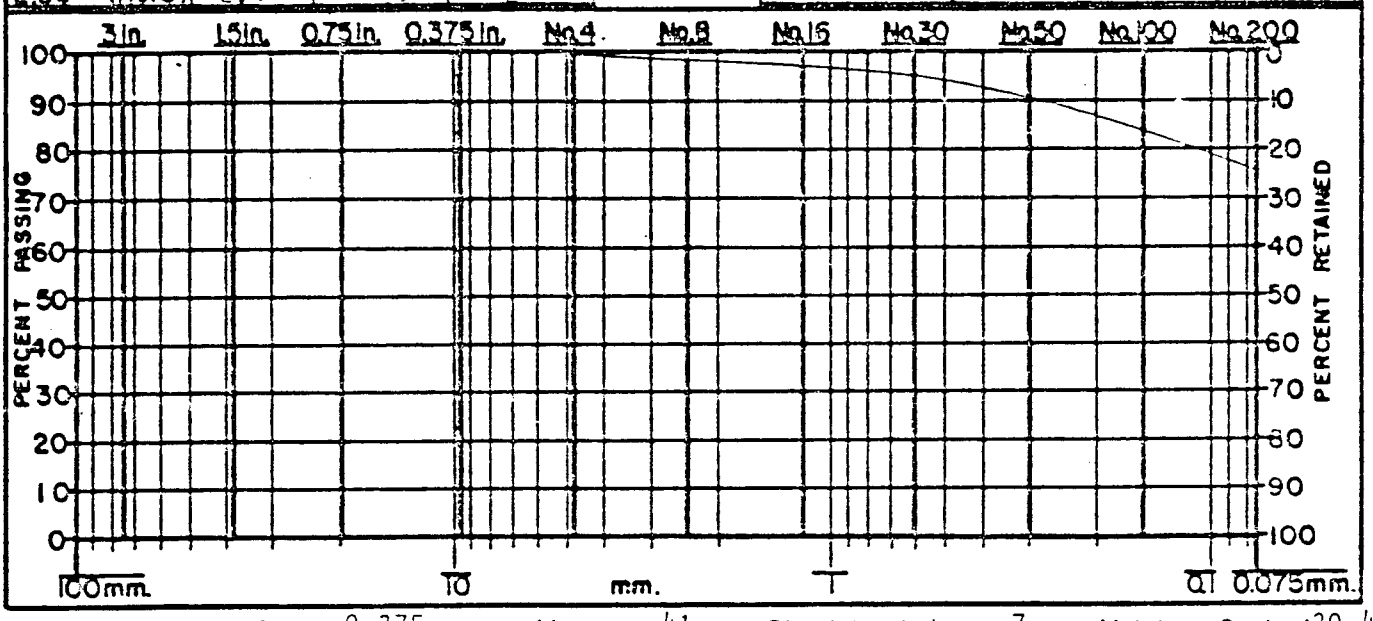
PROJECT 90,000 Gallon Propane Tank

REPORT OF TEST ON Elastic silt (ML)

RECEIVED FROM Boring Number 1 at 5 foot depth

REPORT OF PARTICLE SIZE ANALYSIS

SIEVE SIZE	CUM. WT. RETAINED	PERCENT PASSING	PERCENT RETAINED	SIEVE SIZE	CUM. WT. RETAINED	PERCENT PASSING	PERCENT RETAINED
75 mm. (3 in.)				1.18mm. (No.16)	5.2	97	3
38.1 (1.5)				0.60 (No.30)	8.8	95	5
19.0 (0.75)				0.30 (No.50)	17.5	90	10
9.5 (0.375)	0	100	0	0.15 (No.100)	29.5	83	17
4.75 (No. 4)	.5	100	0	0.075 (No.200)	41.3	76	24
2.36 (No. 8)	2.8	98	2				



Maximum Particle Size -0.375 Liquid Limit 41 Plasticity Index 7 Moisture Content 20.4%

This report covers laboratory procedures in accordance with ASTM D 2487, D 2217, D422, D423, D424 & D2216.

REMARKS:

COPIES TO

LABORATORY NO

FILE NO 86080

CERTIFIED BY

Danny R Anderson, Consultants

GEOTECHNICAL ENGINEERS
2525 EAST YANDELL DR
EL PASO, TEXAS 79903
(915) 532-7566

DATE

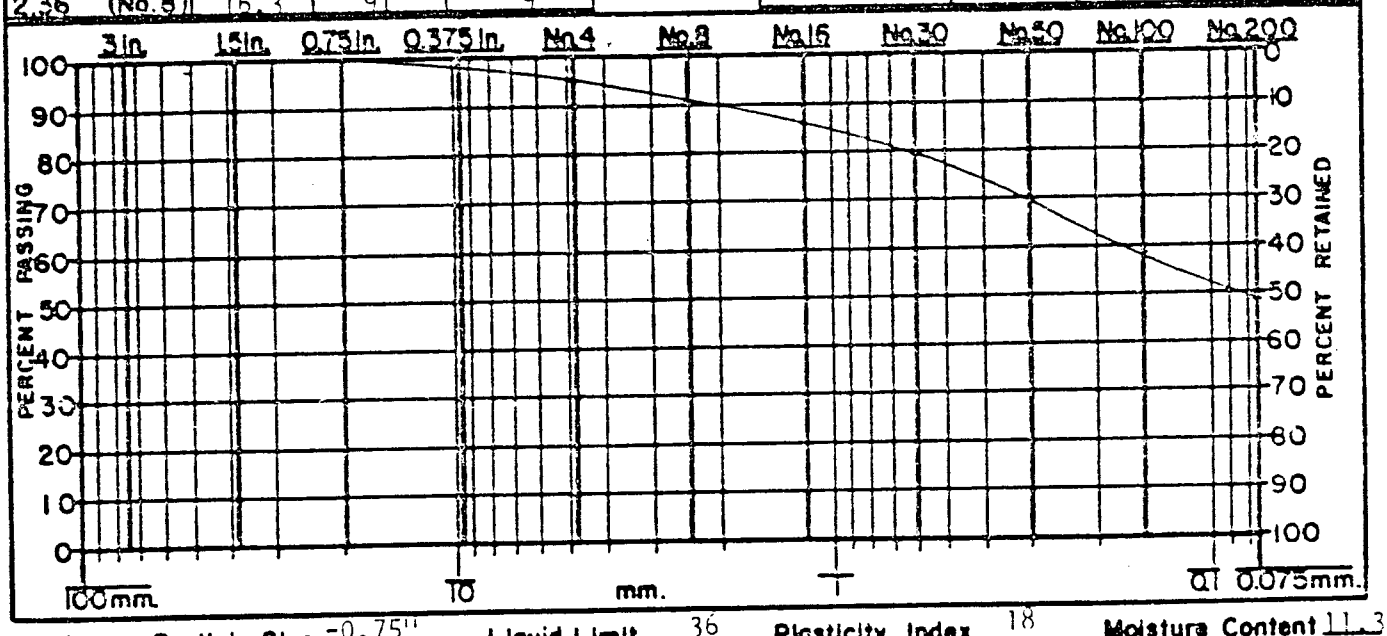
PROJECT 90,000 Gallon Propane Tank

REPORT OF TEST ON Clayey sand (SC)

RECEIVED FROM Boring Number 2 at 2½ foot depth

REPORT OF PARTICLE SIZE ANALYSIS

SIEVE SIZE	CUM. WT. RETAINED	PERCENT PASSING	PERCENT RETAINED
75 mm. (3 in.)			
38.1 (1.5)			
19.0 (0.75)	0	100	0
9.5 (0.375)	4.0	98	2
4.75 (No. 4)	8.8	95	5
2.36 (No. 8)	16.3	91	9
1.18mm. (No.16)	24.3	86	14
0.60 (No.30)	35.9	79	21
0.30 (No.50)	52.9	70	30
0.15 (No.100)	74.0	58	42
0.075 (No.200)	90.4	48	52



Maximum Particle Size -0.75" Liquid Limit 36 Plasticity Index 18 Moisture Content 11.3%

This report covers laboratory procedures in accordance with ASTM D 2487, D 2217, D422, D423, D424 & D2216.

REMARKS:

COPIES TO

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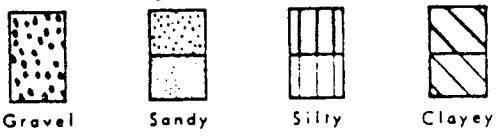
KEY TO SOIL CLASSIFICATIONS AND SYMBOLS

SOIL TYPE



Predominant type shown heavy

SAMPLE TYPE

TERMS DESCRIBING CONSISTENCY OR CONDITION

COARSE GRAINED SOILS
(Major portion retained on No. 200 sieve)

Includes (1) clean gravels and sands described as fine, medium or coarse, depending on distribution of grain sizes and (2) silty or clayey gravels and sands. Condition is rated according to relative density, as determined by laboratory tests or estimated from resistance to sampler.

Penetration Resistance Blows/Foot **	Descriptive Term	Relative Density *
0 - 10	Loose	0 to 40%
10 - 30	Medium dense	40 to 70%
30 - 50	Dense	70 to 90%
Over 50	Very dense	90 to 100%

* From tests on undisturbed sand sample
** 140# hammer, 30-inch drop

FINE GRAINED SOILS
(Major portion passing No. 200 sieve)

Includes (1) inorganic and organic silts and clays, (2) gravelly, sandy, or silty clays, and (3) clayey silts. Consistency is rated according to shearing strength, as indicated by penetrometer readings or by unconfined compression tests.

Descriptive Term	Compressive Strength Tons/Sq. Ft.
Very soft	less than 0.25
Soft	0.25 to 0.50
Firm	0.50 to 1.00
Stiff	1.00 to 2.00
Very stiff	2.00 to 4.00
Hard	4.00 and higher

Note: Slickensided and fissured clays may have lower unconfined compressive strengths than shown above, because of planes of weakness or shrinkage cracks in the soil. The consistency ratings of such soils are based on penetrometer readings.

TERMS CHARACTERIZING SOIL STRUCTURE

Slickensided - having inclined planes of weakness that are slick and glossy in appearance

Fissured - containing shrinkage cracks, frequently filled with fine sand or silt; usually more or less vertical

Sensitive - pertaining to cohesive soils that are subject to appreciable loss of strength when remolded

Laminated - composed of thin layers of varying color and texture

Interbedded - composed of alternate layers of different soil types

Calcareous - containing appreciable quantities of calcium carbonate

Well graded - having wide range in grain sizes and substantial amounts of all intermediate particle sizes

Poorly graded - predominantly of one grain size, or having a range of sizes with some intermediate size missing

INCOMING POWER

PLANT WASTE STORAGE

CONDENSATE TRAP

WASTE WATER PUMP

ACID GAS LINE

1

2

WATER STORAGE FROM REGENERATOR

4

GLYCOL REGENERATOR

GLYCOL STORAGE

3

WATER PUMP

5

WATER STORAGE

6

7

FLARE STACK

ROAD

FILTER STORAGE BUILDING

AMINE FILTER CASES

CHARCOAL VESSEL

AMINE & ACID GAS FIN FANS

SWITCH RACK

PUMP BUILDING WASTE STORAGE

AMINE PUMPS

TRANSFER SWITCH

EMERGENCY GENERATOR

SURGE TANK

AMINE-AMINE EXCHANGER

CORROSION INHIBITOR

STILL

REBOILER

REFLUX PUMPS

REFLUX ACCUMULATOR

8 DEA STORAGE

9 DEA STORAGE

STEAMER

FLASH TANK

CONTACTOR SCRUBBER

GAS AMINE EXCHANGER

INLET & OUTLET GAS PIPE RUNS

GLYCOL CONTACTOR

TAIL SCRUBBER

METER HOUSE

OFFICE BUILDING

SHUTDOWN SYSTEM

H2S ANALYZERS

PLANT H2S MONITOR

SEPTIC TANK

GAS FLOW

GAS AMINE EXCHANGER

CONTACTOR SCRUBBER

TAIL SCRUBBER

GLYCOL CONTACTOR

INLET

OUTLET

ACID GAS FLOW

TO FLARE

FIN FAN

REFLUX ACCUMMULATOR

REFLUX (WATER)

FLASH TANK

STILL

AMINE FLOW

CONTACTOR SCRUBBER

FLASH TANK

FILTER

CHARCOAL

STILL

REBOILER

GAS-AMINE EXCHANGER

AMINE-AMINE EXCHANGER

FIN-FANS

PUMP

SURGE TANK

SWEET GAS METER RUN

INLET GAS FILTER SEPARATOR CASES

11 12 13

METHANOL STORAGE

PIG RECIEVER

10

LIQUID RECEIVER

GAS

LIQUIDS

14 15 16

CONDENSATE CUSTODY TRANSFER

210 TANKS

GAS COMPANY OF NEW MEXICO

PURIFICATION PLANT

PLOT PLAN

REVISED 9-9-91 KT

NO SCALE	Drown By: V.R.	9-26-86