

GW - 46

**GENERAL
CORRESPONDENCE**

YEAR(S):

1993 - 1980



CONSERVATION DIVISION
RECEIVED

93 OCT 7 AM 8 50

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

October 5, 1993

Permit #GW93031

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 September 15, 1993, regarding the Oil Conservation Division (OCD) discharge plan applications submitted by El Paso Natural Gas Company on fish, shellfish, and wildlife resources in New Mexico.

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

(GW-8) - El Paso Natural Gas Company, Monument Gas Plant located in the NW/4, Section 1, Township 20 South, Range 36 East, Lea County, New Mexico. Approximately 9,600 gallons per day of process waste water will be collected and stored in steel tanks prior to disposal at an OCD approved offsite Class II injection well.

(GW-46) - El Paso Natural Gas Company, Eunice Gas Plant located in the NW/4, Section 5, Township 21 South, Range 36 East, Lea County, New Mexico. Approximately 17,000 gallons per day of cooling tower blowdown water will be collected and stored in steel tanks prior to disposal at an OCD approved offsite Class II injection well.

The steel tanks capacities should be able to contain all the water produced during periods of inclement weather when it is not possible to drain the tank on a regular schedule. The tanks should also exhibit strong corrosion resistance to those fluids the tank will store. The tanks should be exposed entirely to visually detect leaks. If leaks are detected surface soil monitoring and runoff prevention measures should be implemented. The permit requests also did not disclose whether the tanks were completely closed. If the top is open, the tank should be netted so as to not present a potential threat to endangered species or to migratory birds that may be found in the area.

Mr. William J. Lemay

2

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

Sincerely,


for Jennifer Fowler-Propst
State Supervisor

cc:

Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico
Regional Administrator, U.S. Environmental Protection Agency, Dallas, Texas

'93 OCT 12 AM 9 28

Paul D. Campbell being duly sworn declares and says that he is National Advertising manager of **The Albuquerque Journal**, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made or assessed as court costs; that the notice, copy of which is hereto attached, was published in said paper in the regular daily edition, for 1 times, the first publication being on the 6 day of Oct., 1993, and the subsequent consecutive publications on _____, 1993.

Paul D Campbell
Sworn and subscribed to before me, a notary Public in and for the County of Bernalillo and State of New Mexico, this 6 day of Oct 1993.

Bernadette Ortiz
NOTARY PUBLIC
STATE OF NEW MEXICO
12-18-93

PRICE *NOCHARGE
Statement to come at end of month. *CG*

CLA-22-A (R-1/93) ACCOUNT NUMBER C81184

PUBLISHERS CORRECTION

**NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY, MINERALS & 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, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

(GW-8) - El Paso Natural Gas Company, Donald N. Bigbie, Vice President, 304 Texas Street, El Paso, Texas 79901, has submitted an application for renewal of a previously approved discharge plan for the Monument Gas plant located in the NW/4 Section 1, Township 20 South, Range 38 East, NMPM, Lea County, New Mexico. Approximately 9600 gallons per day of processed waste water with total dissolved solids at an OCD approved Class II injection well. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 35 feet with a total dissolved solids concentration of 500 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-48) - El Paso Natural Gas Company, Donald N. Bigbie, Vice President, 304 Texas Street, El Paso, Texas 79901, has submitted an application for renewal of a previously approved discharge plan for the Eunice Gas Plant located in the NW/4 Section 5, Township 21 South, Range 38 East, NMPM, Lea County, New Mexico. Approximately 17,000 gallons per day of cooling tower blowdown was the total dissolved solids concentration of 1300 mg/l is stored in steel tanks prior to offsite disposal at an OCD approved Class II injection well. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 35 feet with a total dissolved solids concentration of approximately 1000 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges 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 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 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. Request for public hearing shall set forth the reasons why a hearing shall be held. A hearing will be held if the Director determines that there is public interest.

GIVEN under the Seal of New Mexico Oil Conservation Division at Santa Fe, New Mexico, on this 2nd day of September, 1993.

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

Affidavit of Publication

STATE OF NEW MEXICO)
) ss.
COUNTY OF LEA)

Joyce Clemens being first duly sworn on oath deposes and says that he is Adv. Director of THE LOVINGTON DAILY LEADER, a daily newspaper of general paid circulation published in the English language at Lovington, Lea County, New Mexico; that said newspaper has been so published in such county continuously and uninterruptedly for a period in excess of Twenty-six (26) consecutive weeks next prior to the first publication of the notice hereto attached as hereinafter shown; and that said newspaper is in all things duly qualified to publish legal notices within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico.

That the notice which is hereto attached, entitled
Notice Of Publication

and numbered ~~XXXXXX~~ ~~XXXXXX~~ Court of Lea County, New Mexico was published in a regular and entire issue of THE LOVINGTON DAILY LEADER and not in any supplement thereof, once each week on the same day of the week, for one (1) day consecutive weeks, beginning with the issue of September 15, 19 93 and ending with the issue of September 15, 19 93

And that the cost of publishing said notice is the sum of \$ 48.60

which sum has been (Paid) (Assessed) as Court Costs

Joyce Clemens
Subscribed and sworn to before me this 23rd

day of September, 19 93

Mrs Jan Sevier
Notary Public, Lea County, New Mexico

My Commission Expires Sept. 28, 19 94

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, State Land Office Building, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telephone (505) 827-5800:

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Any interested person may obtain further information from the Oil Conservation Division and may submit written comments to the Director of the Oil Conservation Division at the address given above. The discharge plan application may be viewed at the above address between 8:00 a.m. and 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 2nd day of September, 1993.

STATE OF NEW MEXICO
OIL CONSERVATION
DIVISION
WILLIAM J. LEMAY,
Director
(SEAL)
Published in the Lovington Daily Leader September 15, 1993.

STATE OF NEW MEXICO
County of Bernalillo

SS

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

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GIVEN under the Seal of New Mexico Oil Conservation Division at Santa Fe, New Mexico, on this 2nd day of September, 1993.

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

Journal: September 22, 1993

Paul D. Campbell being duly sworn declares and says that he is National Advertising manager of **The Albuquerque Journal**, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made or assessed as court costs; that the notice, copy of which is hereto attached, was published in said paper in the regular daily edition, for 1 times, the first publication being on the 22 day of Sept., 1993, and the subsequent consecutive publications on _____, 1993.

Paul D. Campbell

Sworn and subscribed to before me, a notary Public in and for the County of Bernalillo and State of New Mexico, this 22 day of Sept 1993.

PRICE \$ 36.57 *CE*

Statement to come at end of month.

CLA-22-A (R-1/93) ACCOUNT NUMBER C81184

Notary Seal: *Bernadette Ortiz*
BERNADETTE ORTIZ
PUBLIC-NEW MEXICO
NOTARY SECRETARY OF STATE
Date: 12-18-93

State of New Mexico
Energy, Minerals and Natural Resources Department
OIL CONSERVATION DIVISION
P.O. Box 2088
Santa Fe, NM 87501

**DISCHARGE PLAN APPLICATION FOR NATURAL GAS PROCESSING PLANTS,
OIL REFINERIES AND GAS COMPRESSOR STATIONS**
(Refer to OCD Guidelines for assistance in completing the application.)

RECEIVED

SEP 07 1993

I. TYPE: Eunice Station - Natural gas compression
II. OPERATOR: El Paso Natural Gas Company OIL CONSERVATION DIV.
ADDRESS: P. O. Box 1492, El Paso, Texas, 79978 SANTA FE
CONTACT PERSON: Mr. Philip L. Baca PHONE: 915/541-2323

III. LOCATION: Lots 6, 11, and 14 Section 5 Township 21-S Range 36-E
Submit large scale topographic map showing exact location.

- IV. Attach the name and address of the landowner(s) of the disposal facility site.
- V. Attach description of the facility with a diagram indicating location of fences, pits, dikes, and tanks on the facility.
- VI. Attach a description of sources, quantities and quality of effluent and waste solids.
- VII. Attach a description of current liquid and solid waste transfer and storage procedures.
- VIII. Attach a description of current liquid and solid waste disposal procedures.
- IX. Attach a routine inspection and maintenance plan to ensure permit compliance.
- X. Attach a contingency plan for reporting and clean-up of spills or releases.
- XI. Attach geological/hydrological evidence demonstrating that disposal of oil field wastes will not adversely impact fresh water. Depth to and quality of ground water must be included.
- XII. Attach such other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.

XIII. CERTIFICATION

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

Name: Lori A. Saylor Title: Compliance Engineer

Signature: Lori A. Saylor Date: 09-02-93

DISTRIBUTION: Original and one copy to Santa Fe with one copy to appropriate Division District Office.

El Paso
Natural Gas Company

ONE PETROLEUM CENTER / BUILDING TWO
3300 NORTH "A" STREET
MIDLAND, TEXAS 79705

September 2, 1993

Mr. Roger Anderson
New Mexico Oil Conservation Division
State Land Office Building
310 Old Santa Fe Trail
Santa Fe, New Mexico 87504

RECEIVED
SEP 07 1993
OIL CONSERVATION DIV.
SANTA FE

Subject: El Paso Natural Gas Company's Eunice Station Discharge Plan GW-46
Renewal Application

Dear Mr. Anderson:

El Paso Natural Gas Company (EPNG) is submitting for your review the Discharge Plan GW-46 Renewal for the EPNG Eunice Gas Compressor Station, located in Lea County, New Mexico. Enclosed please find two copies of the renewal application. In addition, enclosed please find a check in the amount of \$50.00 required by the NMWQCC as a filing fee assessment.

If there are any questions or comments regarding this subject or if additional information is found necessary, please feel free to contact me at 915/686-3226.

Sincerely,



Lori A. Saylor, Engineer
Environmental Compliance Engineering

Enclosures

cc: New Mexico Oil Conservation Division
District 1 - Hobbs Office
P. O. Box 1980
Hobbs, NM 88240
Attn: Mr. Jerry Sexton

NOTICE OF PUBLICATION

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

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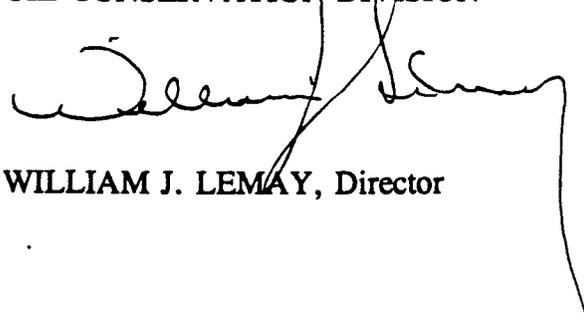
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If no hearing is held, the Director will approve or disapprove the plan based on the information available. If a public hearing is held, the Director will approve the plan based on the information in the plan and information presented at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Division at Santa Fe, New Mexico, on this 2nd day of September, 1993.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION



WILLIAM J. LEMAY, Director

SEAL

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. 07247388 dated 9/2/93,
or cash received on 9/9/93 in the amount of \$ 50.00
from El Paso Natural Gas Company
for Eunice Gas Plant BW-46

Submitted by: _____ (Facility Name) Date: _____ (OP No.)

Submitted to ASD by: Kathy Brown Date: 9/9/93

Received in ASD by: Angie Aulse Date: 9/9/93

Filing Fee New Facility _____ Renewal _____
Modification _____ Other _____
(specify)

Organization Code 521.07 Applicable FY 94

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

 **El Paso**
Natural Gas Company
P.O. BOX 1492
EL PASO, TX 79978

PAYABLE AT
CITIBANK DELAWARE
A SUBSIDIARY OF CITICORP
ONE PENN'S WAY
NEW CASTLE, DE 19720

CONTROL NO.
232 CBD
62-20
311

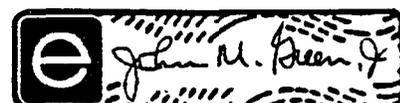
CHECK NO.
007247388 *
09/02/93
Date

PAY TO THE ORDER OF

NEW MEXICO WATER QUALITY
MANAGEMENT
P O BOX 2088
SANTA FE

NM 87504

PAY AMOUNT
\$50.00
Void After 1 Year


Authorized Signatory

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION



BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

November 9, 1993

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

CERTIFIED MAIL
RETURN RECEIPT NO.P-111-334-279

Ms. Lori Saylor
El Paso Natural Gas Company
One Petroleum Center/Building One
3300 N. "A" Street
Midland, Texas 79705

**RE: Discharge Plan GW-46
Eunice Compressor Station
Lea County, New Mexico**

Dear Ms. Saylor:

The New Mexico Oil Conservation Division (OCD) has received the discharge plan renewal application dated October 11, 1993 for the above referenced facility. The following request for additional information and commitments are based on a review of the application, the previously approved discharge plan and observations made during the September 28, 1993 OCD inspection of the facility.

The site inspection revealed the lube oil storage tank was inside a containment wall that did not have concrete flooring. Propose a method to ensure that contaminants do not reach the ground and become available for leaching into the subsurface.

Submittal of the requested information and commitment in a timely fashion will expedite the final review of the application and approval of the discharge plan renewal.

If you have any questions, please contact me at (505) 827-5824.

Sincerely,

A handwritten signature in cursive script, appearing to read "Chris Eustice".

Chris Eustice
Geologist

xc: Hobbs OCD Office



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



BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

January 27, 1993

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

CERTIFIED MAIL
RETURN RECEIPT NO.P-111-334-302

Mr. Donald Payne, Manager
North Region Compliance Engineering
El Paso Natural Gas Company
P. O. Box 1492
El Paso, Texas 79978

**RE: Discharge Plan GW-46
Eunice Mainline Engine Room
Lea County, New Mexico**

Dear Mr. Payne:

On June 6, 1989, the groundwater discharge plan , GW-46 for the Eunice Mainline Engine Room located in the NW/4 of Section 5, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico, was approved by the Director of the Oil Conservation Division (OCD). This discharge plan was required and submitted pursuant to Water Quality Control Commission (WQCC) regulations and was approved for a period of five years. The approval will expire on October 11, 1993.

If your facility continues to have potential or actual effluent or leachate discharges and you wish to continue operations, you must renew your discharge plan. The OCD is reviewing discharge plan submittals and renewals carefully and the review time can extend for several months. Please indicate whether you have made, or intend to make, any changes in your discharge system, and if so, please include these modifications in your application for renewal.

Mr. Donald Payne
January 27, 1993
Page 2

Note that the completed and signed application form must be submitted with your discharge plan renewal request.

If you no longer have any actual or potential discharges please notify this office. If you have any questions, please do not hesitate to contact Chris Eustice at (505) 827-5824.

Sincerely,

A handwritten signature in cursive script, appearing to read "Roger C. Anderson".

Roger C. Anderson
Environmental Bureau Chief

RCA.cce

xc: OCD Hobbs Office

El Paso
Natural Gas Company

P. O. BOX 1492
EL PASO, TEXAS 79978
PHONE: 915-541-2600

July 18, 1989

RECEIVED

William J. LeMay,
Director
State of New Mexico
Oil Conservation Division
P.O. Box 2088
State Land Office Building
Santa Fe, New Mexico 87504

JUL 21 1989

OIL CONSERVATION DIV.
SANTA FE

Re: Discharge Plan GW-46 Eunice
Mainline Engine Room, Lea County,
New Mexico

Dear Mr. LeMay:

In response to your letter of June 6, 1989, El Paso completed the design of the berming for the aboveground tanks and the drum storage containment on May 17, 1989. The construction is scheduled to begin on July 21, 1989 and should be completed by August 14.

With the submission of this timetable, it is El Paso's understanding that the discharge plan for Eunice Mainline Engine Room has been approved and will not expire until October 11, 1993.

If you have any questions concerning this timetable, please contact me at (915) 541-5399.

Very truly yours,

Donald R. Payne

Donald R. Payne, P.E.
Manager, Compliance Engineering

mts

c: K.E. Beasley
D.N. Bigbie
J. Hill
W.A. Johnson
J.R. Midkiff
J.W. Somerhalder
H. Van
J.P. Wheeler



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS
GOVERNOR

June 6, 1989

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

CERTIFIED MAIL
RETURN RECEIPT NO. P-106-675-533

Mr. Donald N. Bigbie
Vice President, North Region
EL PASO NATURAL GAS COMPANY
P. O. Box 1492
El Paso, Texas 79978

RE: Discharge Plan GW-46
Eunice Mainline Engine Room
Lea County, New Mexico

Dear Mr. Bigbie:

The ground water discharge plan (GW-46) renewal for the El Paso Natural Gas Company's Eunice Mainline Engine Room located in the NW/4 of Section 5, township 21 South, Range 36 East, NMPM, Lea County, New Mexico, is hereby approved with the following conditions:

1. A timetable for the design and construction of the berming for above ground tanks will be submitted for review by July 30, 1989.
2. A timetable for the design and construction of drum storage containment will be submitted for review by July 30, 1989.

The original discharge plan was approved on October 11, 1983 and expired on October 11, 1988. The renewal application consists of the original discharge plan as approved October 11, 1983, the application dated October, 1988 and materials dated April 17, 1989 submitted as supplements to the renewal application.

The discharge plan renewal was submitted pursuant to Section 3-106 of the New Mexico Water Quality Control Commission Regulations. It is renewed pursuant to Section 3-109.F., which provides for the possible future amendments of the plan. Please be advised that the approval of this plan does not relieve you of liability should your operation result in actual pollution of the environment which may be actionable under other laws and/or regulations.

There will be no routine monitoring or reporting requirements.

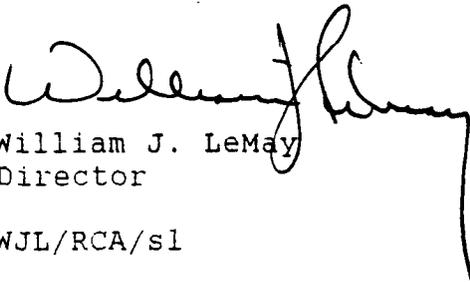
Mr. Donald N. Bigbee
June 6, 1989
Page -2-

Please note that Section 3-104 of the regulations requires that "when a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3-107.C., you are required to notify the Director of any facility expansion, production increase, or process modification that would result in any change in the discharge of water quality or volume.

Pursuant to Section 3-109.G.4, this plan approval is for a period of five (5) years. This approval will expire October 11, 1993, and you should submit an application for renewal in ample time before that date. It should be noted all gas processing plants and oil refineries in excess of twenty-five years of age will be required to submit plans for, or the results of an underground drainage testing program as a requirement for discharge plan or renewal.

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

Sincerely,



William J. LeMay
Director

WJL/RCA/sl

cc: OCD Hobbs Office
Henry Van - EPNG, El Paso
D. R. Payne - EPNG, El Paso

May 22, 1989

RECEIVED

JUN - 2 1989

**OIL CONSERVATION DIV.
SANTA FE**

Mr. Roger C. Anderson
Environmental Engineer
New Mexico Oil Conservation Division
310 Old Santa Fe Trail, 206
Santa Fe, NM 87504

Re: Discharge Plant GW-46 and GW-8
EPNG Eunice and Monument Gas Plants

Dear Mr. Anderson:

During your May 22 telephone conversation with Henry Van, you asked about the dry and wet analysis conducted on the soil samples taken by the cooling towers at the above mentioned facilities.

The specific conductance of the soil sample is first analyzed in the dry stage to record the "as received" condition of the soil. Measured amounts of distilled water are added to the sample to moisten the soil until the sample becomes normalized. At this stage the sample is again analyzed for specific conductance and recorded as the wet analysis. Of the two recorded readings, the wet analysis is the official reading. The electrical conductivity testing has indicated that most of the salts have been retained in the upper two feet of the soil tested.

The cooling towers at both Eunice and Monument Plants have undergone maintenance repairs. This will reduce the ponding caused by the over spray during the windy months. The following partial list includes the work completed at both locations:

- The Water Distribution System - At Eunice replaced with a new system. At Monument, the system has been completely cleaned and repaired.
- Drift Pans (Top) - At both Eunice and Monument have been cleaned out and a 6" layer of honey cone plastic sheet has been installed to help control water flow. (Draft Eliminator).
- Field Pans (Bottom) - At both locations have been cleaned out and a 12" layer of honey cone plastic sheet installed to break the water flow. (Draft Eliminator).
- Wind Wall - A new Wind Wall has been installed for the Eunice cooling tower, the Wind Wall for Monument was reconditioned.
- Cooling Tower Joist Supports - At both locations some have been replaced, others repaired.
- Cooling Tower Doors - At both locations some minor repairs and recondition have been done.

May 22, 1989
Mr. Roger C. Anderson
Page 2

If you have any questions or if I may be of further assistance, please call me at (915) 541-2407.

Sincerely,

Osias Uribe

Osias Uribe
Environmental Technician
Environmental & Safety Affairs Department

OU/teb

cc: L.J. Meyer
G.J. Odegard
D.R. Payne
H. Van
file: 5000, 5007

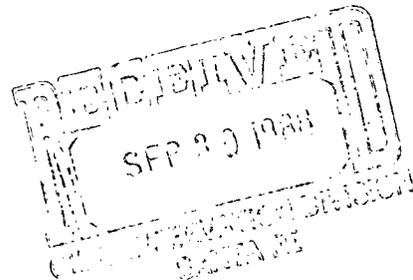
El Paso NATURAL GAS
COMPANY

P. O. BOX 1492
EL PASO, TEXAS 79978
PHONE: 915-543-2600

ALEXANDER H. CARAMEROS VICE PRESIDENT

September 23, 1988

Mr. William J. LeMay, Director
Energy, Minerals and Natural Resources Department
New Mexico Oil Conservation Division
310 Old Santa Fe Trail #206
Santa Fe, NM 87504



RE: Discharge Plan GW-46 for El Paso Natural
Gas Company - Eunice Plant Mainline Engine Room

Dear Mr. LeMay:

Enclosed for your review is the completed Discharge Plan for the El Paso Natural Gas Company Eunice Plant Mainline Engine Room. The plan details proposed methods and techniques to ensure compliance with the New Mexico Water Quality Act and New Mexico Water Quality Control Commission Regulations.

El Paso respectfully requests approval of this plan and will meet with agency personnel whenever necessary should clarification or further information be required. Information requests should be directed to Mr. Donald R. Payne, Manager of Compliance Engineering for the South Region at (915) 541-5399.

Thank you for your consideration in this matter.

Very truly yours,

EL PASO NATURAL GAS COMPANY

Alexander H. Carameros
Vice President

AHC:cds

Enclosure



New Mexico Health and Environment Department
 SCIENTIFIC LABORATORY DIVISION
 700 Camino de Salud NE
 Albuquerque, NM 87106 — (505) 841-2555

860
WNN

**GENERAL WATER CHEMISTRY
and NITROGEN ANALYSIS**

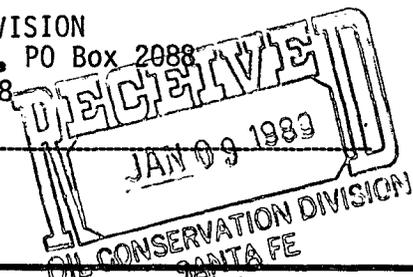
DATE RECEIVED <u>12/18/89</u>	LAB NO. <u>WC-4772</u>	USER CODE <input type="checkbox"/> 59300 <input type="checkbox"/> 59600 <input checked="" type="checkbox"/> OTHER: <u>82235</u>
Collection DATE <u>12/11/89</u>	SITE INFORMATION	Sample location <u>EPNG - Mainline Engine Room</u>
Collection TIME <u>1150</u>		Collection site description <u>Cooling tower sump/Eumice</u>
Collected by — Person/Agency <u>Boyer/Jackson /OCD</u>		

SEND FINAL REPORT TO

ENVIRONMENTAL BUREAU
 NM OIL CONSERVATION DIVISION
 State Land Office Bldg, PO Box 2088
 Santa Fe, NM 87504-2088

Attn: David Boyer

Phone: 827-5812



Station/well code 215, 36E, 05-1
 Owner

SAMPLING CONDITIONS

<input type="checkbox"/> Bailed	<input type="checkbox"/> Pump	Water level	Discharge	Sample type <u>Grab</u>
<input checked="" type="checkbox"/> Dipped	<input type="checkbox"/> Tap			
pH (00400) <u>7 (strip)</u>	Conductivity (Uncorrected) <u>1080</u> μmho	Water Temp. (00010) <u>20.5</u> $^{\circ}\text{C}$	Conductivity at 25 $^{\circ}\text{C}$ (00094) μmho	
Field comments				

SAMPLE FIELD TREATMENT — Check proper boxes

No. of samples submitted <u>1</u>	<input checked="" type="checkbox"/> NF: Whole sample (Non-filtered)	<input type="checkbox"/> F: Filtered in field with 0.45 μm membrane filter	<input type="checkbox"/> A: 2 ml H ₂ SO ₄ /L added
<input checked="" type="checkbox"/> NA: No acid added	<input type="checkbox"/> Other-specify:	<input type="checkbox"/> A: 5ml conc. HNO ₃ added	<input type="checkbox"/> A: 4ml fuming HNO ₃ added

ANALYTICAL RESULTS from SAMPLES

NA	Units	Date analyzed	From <u>NS</u> , NA Sample:	Date Analyzed
<input checked="" type="checkbox"/> Conductivity (Corrected) 25 $^{\circ}\text{C}$ (00095)	<u>2399</u> μmho	<u>12/19</u>	<input checked="" type="checkbox"/> Calcium <u>332</u> mg/l	<u>12/05</u>
<input type="checkbox"/> Total non-filterable residue (suspended) (00530)			<input checked="" type="checkbox"/> Potassium <u>35</u> mg/l	<u>12/11</u>
<input checked="" type="checkbox"/> Other: <u>Lab pH</u>	<u>7.27</u>	<u>12/13</u>	<input checked="" type="checkbox"/> Magnesium <u>53.1</u> mg/l	<u>12/05</u>
<input type="checkbox"/> Other:			<input checked="" type="checkbox"/> Sodium <u>195</u> mg/l	<u>12/11</u>
<input type="checkbox"/> Other:			<input checked="" type="checkbox"/> Bicarbonate <u>57.3</u> mg/l	<u>12/13</u>
A-H₂SO₄			<input checked="" type="checkbox"/> Chloride <u>209</u> mg/l	<u>12/15</u>
<input type="checkbox"/> Nitrate-N +, Nitrate-N total (00630)			<input checked="" type="checkbox"/> Sulfate <u>979</u> mg/l	<u>12/15</u>
<input type="checkbox"/> Ammonia-N total (00610)			<input checked="" type="checkbox"/> Total Solids <u>2144</u> mg/l	<u>12/12</u>
<input type="checkbox"/> Total Kjeldahl-N ()			<input checked="" type="checkbox"/> <u>CO₃</u> <u>0</u>	<u>12/13</u>
<input type="checkbox"/> Chemical oxygen demand (00340)			<input type="checkbox"/>	
<input type="checkbox"/> Total organic carbon ()			<input checked="" type="checkbox"/> Cation/Anion Balance	
<input type="checkbox"/> Other:			Analyst	Date Reported <u>1/5/89</u>
<input type="checkbox"/> Other:				Reviewed by <u>C. Dean</u>

Laboratory remarks

209

FOR OCD USE -- Date Owner Notified 2/21/89 Phone or Letter? (Letter?) Initials ADG



701

HEAVY METAL ANALYSIS FORM

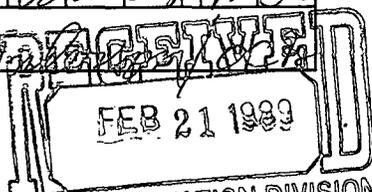
Telephone: (505)841-2553

Date Received 12/2/88 Lab No. AM-1940 User Code 82235 Other:

COLLECTION DATE & TIME: yy mm dd hh mm 88 11 29 11 50 COLLECTION SITE DESCRIPTION EPNG - Elyice, Mainline Engine Room

COLLECTED BY: Boyer / [Signature]

TO: [Signature] OWNER: _____



ENVIRONMENTAL BUREAU OF CONSERVATION DIVISION
 NM OIL CONSERVATION DIVISION
 State Land Office Bldg., PO Box 2088
 SANTA FE, NM 87504-2088

SITE LOCATION: County: Lea

Township, Range, Section, Tract: (10N06E24342) 12/15+316E+05+1-1

ATTN: D. Boyer
 TELEPHONE: 827-5812

STATION/ WELL CODE: _____

LATITUDE, LONGITUDE: _____

SAMPLING CONDITIONS:

Bailed Pump Water Level: _____ Discharge: _____ Sample Type: Gravel
 Dipped Tap

pH(00400) _____ Conductivity(Uncorr.) 1880 μ mho Water Temp.(00010) 20.5 $^{\circ}$ C Conductivity at 25 $^{\circ}$ C (00094) _____ μ mho

FIELD COMMENTS: _____

SAMPLE FIELD TREATMENT Check proper boxes:

WPN: Water Preserved w/HNO₃ Non-Filtered WPF: Water Preserved w/HNO₃ Filtered

LAB ANALYSIS REQUESTED: ICAP Scan Mark box next to metal if AA is required.

ANALYTICAL RESULTS (MG/L)

ELEMENT	ICAP VALUE	AA VALUE	ELEMENT	ICAP VALUE	AA VALUE
Aluminum	0.1	_____	Silicon	68.	_____
Barium	0.2	_____	Silver	<0.1	<input type="checkbox"/>
Beryllium	<0.1	_____	Strontium	2.3	_____
Boron	0.5	_____	Tin	0.3	_____
Cadmium	<0.1	<input type="checkbox"/>	Vanadium	0.1	_____
Calcium	350.	_____	Zinc	6.1	_____
Chromium	<0.1	<input checked="" type="checkbox"/> 0.076	Arsenic	_____	<input type="checkbox"/>
Cobalt	<0.05	_____	Selenium	_____	<input type="checkbox"/>
Copper	<0.1	_____	Mercury	_____	<input type="checkbox"/>
Iron	0.3	_____	_____	_____	<input type="checkbox"/>
Lead	<0.1	<input type="checkbox"/>	_____	_____	<input type="checkbox"/>
Magnesium	40.	_____	_____	_____	<input type="checkbox"/>
Manganese	<0.05	_____	_____	_____	<input type="checkbox"/>
Molybdenum	<0.1	_____	_____	_____	<input type="checkbox"/>
Nickel	<0.1	_____	_____	_____	<input type="checkbox"/>

LAB COMMENTS: _____

For OCD Use:
 Date Owner Notified: 2/21/89 ICAP Analyst JAA Reviewer Jim Ashby
 Phone or Letter? _____ Date Analyzed 1/26/89 Date Received 2/1/89
 Initials: [Signature]

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS
GOVERNOR

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

December 22, 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Charles W. Hagen, Vice President
EL PASO NATURAL GAS COMPANY
South Region
P. O. Box 1492
El Paso, Texas 79978

RE: Discharge Plan GW-46
Eunice Mainline Engine Room

Dear Mr. Hagen:

The Oil Conservation Division (OCD) is in the process of reviewing the above-referenced discharge plan renewal application. The renewal application, dated October 1988, was received by the OCD on September 30, 1988. The following comments and requests for additional information are based on our review of the data provided in the application and observations during the OCD site visit on November 29, 1988.

Section 3. Effluent Sources, Characteristics and Disposal

1. Section 3.2.4 states storm water is collected in open drains and discharged to grade. Does this include storm water that falls on or flows through process areas? Does the storm water enter any conduits that leave your property? If so, identify where the storm water ultimately ends up.
2. Section 3.3.2 states Table 3-2 lists the chemicals used at the facility and Appendix A contains the MDS Sheets for chemicals not listed in the 1983 plan. The following is a list of the MDS sheets not present or incomplete in the 1983 plan or the renewal application.
 1. Antipal-662
 2. Toxene 37
 3. Hydrochem A-239 (incomplete)

Section 6. Monitoring and Reporting

1. This section states annual sampling and analysis of the wastewater stream will be conducted. Please supply the OCD with the results of the analysis.
2. This section also states the sludge from the cooling tower and classifier will be evaluated and disposed of in an approved landfill. OCD approval will be required prior to disposal of these sludges. Please supply the analytical results and evaluation of the sludges and how and where you propose to dispose of the sludges for OCD approval prior to disposal.

Miscellaneous

1. Are there any below grade or underground tanks other than the classifier?
2. Are all above grade tanks bermed to contain one third more than the tank volumes?
3. Are there any tile drainage conduits in use? How old are they? How are they tested? What areas do they drain and to where?
4. Are all process and storage areas bermed and/or curbed? Are the bermed and/or curbed areas also paved to prevent spilled liquid infiltration?
5. Is there an SPCC plan in effect at this facility? If so, please provide a copy.
6. Where and how do you dispose of solid wastes (i.e. filter media, sludges, trash, filter elements, etc.)?
7. The cooling towers showed evidence of excessive spray drifting and ponding of water at the base of the tower. How do you plan to eliminate or contain and isolate this ponding to prevent infiltration of the water into the ground?
8. The storage pads for treatment chemicals at the cooling towers have insufficient containment in the event of tank failure. What actions will be taken to increase containment volume capability?
9. Drum storage areas throughout the facility have no containment or pads. What actions will be taken to prevent any spills or leaks from infiltrating into the ground?

Mr. Charles W. Ha
December 22, 1988
Page -3-

10. Some of the valves for the oil cooling water showed evidence of leaks at the manifold east of the cooling tower. Submit a plan for the elimination and/or containment of any leaks and for the clean up of the soil where previous leaks have occurred.

The submission of the information requested and commitments to correct deficiencies with reasonable timetables will allow the review of your application to continue.

If you have any questions, please contact me at (505) 827-5884.

Sincerely,


Roger C. Anderson
Environmental Engineer

RCA/sl

cc: OCD - Hobbs Office
Donald R. Payne - EPNG
H. Van - EPNG



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

November 15, 1988

Mr. William J. Lemay, Director
New Mexico Energy, Minerals and Natural Resources Department
Oil Conservation Division
State Land Office Building
310 Old Santa Fe Trail, Room 206
Santa Fe, New Mexico 87503

Dear Mr. Lemay:

This responds to your public notice received October 27, 1988 in which several proposed groundwater discharge plans were described. We have reviewed the plans and have not identified any resource issues of concern to our agency in the following:

GW-8, El Paso Natural Gas Company, Monument Gas Plant, Lea County, NM.
GW-9, Phillips 66 Natural Gas Company, Eunice EP Gas Plant, Lea County, NM.
GW-10, El Paso Natural Gas Company, Jal No. 3 Gas Plant, Lea County, NM.
GW-46, El Paso Natural Gas Company, Eunice Main Line Engine Room, Lea County, NM.
TNT Construction Inc., Rio Arriba County, NM.

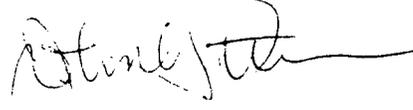
Discharge plan GW-49 is for El Paso Natural Gas Company's Blanco Plant located approximately 1 1/2 miles northeast of Bloomfield, New Mexico. El Paso Natural Gas Company proposes to close its unlined process ponds and discharge approximately 119,900 gallons per day of process and cooling tower wastewater to the Bloomfield Municipal Wastewater Treatment Plant.

The Bloomfield Municipal Wastewater Treatment Plant discharges its treated effluent to the San Juan River. The San Juan River from the Hammond Diversion upstream of Bloomfield to Farmington may provide habitat for the Federally endangered Colorado squawfish. Surveys conducted downstream of Farmington have documented the presence of both adult and juvenile squawfish in the San Juan River. The section of the San Juan River from Bloomfield to Farmington has a high likelihood of the presence of squawfish as well as other fish and aquatic organisms of importance to the rivers ecological balance.

The Bloomfield Wastewater Treatment Plant has received NPDES re-authorization (permit number NM0020770), to discharge to the San Juan River in Segment No. 2-401. The Fish and Wildlife Service would object to the addition of any new pollutants into the treatment works from an indirect discharger, such as the El Paso Natural Gas Company's Blanco Plant, that would cause an increase in biochemical oxygen demand, an increase in total dissolved solids, or a pass-through of toxic or hazardous materials. The effluent limitations of NPDES permit number NM 0020770 must not be exceeded as a result of the addition of the process and cooling tower wastewater.

These comments represent the views of the Fish and Wildlife Service. If you have any questions, please contact Tom O'Brien at (505) 883-7877 or FWS 472-7877.

Sincerely yours.



John C. Peterson
Field Supervisor

cc:

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

AFFIDAVIT OF PUBLICATION

State of New Mexico,
County of Lea.

I, George W. Moore

of the Hobbs Daily News-Sun, a daily newspaper published at Hobbs, New Mexico, do solemnly swear that the clipping attached hereto was published once a week in the regular and entire issue of said paper, and not a supplement thereof for a period

of _____

One weeks.
Beginning with the issue dated

October 28, 1988
and ending with the issue dated

October 28, 1988

George W. Moore
Publisher.

Sworn and subscribed to before

me this 28 day of

October, 1988

Uesa Murphy
Notary Public.

My Commission expires _____

November 14, 1988
(Seal)

This newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Laws of 1937, and payment of fees for said publication has been made.

LEGAL NOTICE
October 28, 1988
NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES
DEPARTMENT
OIL CONSERVATION
DIVISION
Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan has been submitted for renewal to the Director of the Oil Conservation Division, State Land Office Building, 310 Old Santa Fe Trail, Room 206, Santa Fe, New Mexico 87503, Telephone (505) 827-5800:

(GW-8) El Paso Natural Gas Company, Donald N. Biggle, Vice President, North Region, P. O. Box 1492, El Paso, Texas, 79978, has submitted an application for renewal of its previously approved discharge plan for its Monument Gas Plant located approximately 3.5 miles southwest of the town of Monument in the NW/4 of Section 1, Township 20 South, Range 36 East (NMPM), Lea County, New Mexico. Approximately 9600 gallons per day of process wastewater with a total dissolved solids concentration of approximately 3500 mg/l is disposed of in an OCD approved contract disposal well. The discharge plan addresses how spills, leaks and other discharges to the ground at the plant will be managed. The groundwater most likely to be affected by any discharge to the surface is at a depth ranging from 35 to 60 feet with total dissolved solids concentrations from 500 to 3000 mg/l.

(GW-9) Phillips 66 Natural Gas Company, Michael D. Ford, Environmental Analyst, 4001 Penbrook, Odessa, Texas, 79762 has submitted an application for renewal of the previously approved discharge plan for its Eunice EP Gas Plant located approximately 8 miles northwest of the city of Eunice in the NW/4 of Section 5, Township 21 South, Range 36 East (NMPM), Lea County, New Mexico. The previous discharge plan was approved for El Paso Natural Gas Company and was transferred to Phillips 66 Natural Gas Company at the time of ownership transfer. The Mainline Engine Room portion of the facility will remain the responsibility of El Paso Natural Gas Company and the portion of the original discharge plan pertaining to the Mainline Engine Room will be renewed under a new discharge plan designation (GW-46). Approximately 14,100 gallons per day of process wastewater with a total dissolved solids concentration of 1300 mg/l is disposed of in an OCD approved contract disposal well. The discharge plan addresses how spills, leaks and other discharges to the ground at the plant will be managed. The groundwater most likely to be affected by any discharge to the surface is at a depth ranging from 80 to 150 feet with total dissolved solids concentrations from 1000 to 1700 mg/l.

(GW-10) El Paso Natural Gas Company, Charles W. Hagen, Vice President, South Region, P. O. Box 1492, El Paso, Texas, 79978, has submitted an application for renewal of its previously approved discharge plan for its Jai No. 3 Gas

north of the city of Jai in the NW/4 of Section 3, Township 24 South, Range 37 East (NMPM), Lea County, New Mexico. Approximately 28,600 gallons per day of process wastewater with a total dissolved solids concentration of approximately 5410 mg/l is disposed of in an OCD approved disposal well located on the plant property. The discharge plan addresses how spills, leaks and other discharges to the ground at the plant will be managed. The groundwater most likely to be affected by any discharge to the surface is at a depth of approximately 90 feet with total dissolved solids concentration of approximately 900 mg/l.

(GW-46) El Paso Natural Gas Company, Charles W. Hagen, Vice President, South Region, P. O. Box 1492, El Paso, Texas, 79978, has submitted an application to renew its previously approved discharge plan for its Eunice Mainline Engine Room located approximately 8 miles northwest of the city of Eunice in the NW/4 of Section 5, Township 21 South, Range 36 East (NMPM), Lea County, New Mexico. The previous discharge plan was designated GW-9 and is now the responsibility of and is being renewed by Phillips 66 Natural Gas Company. The Mainline Engine Room remains the responsibility of El Paso Natural Gas Company and the portions of the previous discharge plan pertaining to the Mainline Engine Room are being renewed under Discharge Plan GW-46. Approximately 17,000 gallons per day of cooling tower wastewater with a total dissolved solids concentration of approximately 1300 mg/l is disposed of in an OCD approved contract disposal well. The discharge plan addresses how spills, leaks and other discharges to the ground at the plant will be managed. The groundwater most likely to be affected by any discharges to the surface is at a depth ranging from 80 to 150 feet with total dissolved solids concentrations from 1000 to 1700 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 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 21st day of October, to be published on or before November 4, 1988.
STATE OF
NEW MEXICO
OIL CONSERVATION
DIVISION
WILLIAM J. LEMAY.

process wastewater with a total dissolved solids concentration of approximately 5410 mg/l is disposed of in an OCD approved disposal well located on the plant property. The discharge plan addresses how spills, leaks and other discharges to the ground at the plant will be managed. The groundwater most likely to be affected by any discharge to the surface is at a depth of approximately 90 feet with a total dissolved solids concentration of approximately 900 mg/l.

(GW-46) El Paso Natural Gas Company, Charles W. Hagen, Vice President, South Region, P.O. Box 1492, El Paso, Texas, 79978, has submitted an application to renew its previously approved discharge plan for its Eunice Mainline Engine Room located approximately 8 miles Northwest of the City of Eunice in the NW/4 of Section 5, Township 21 South, Range 36 East (NMPM), Lea County, New Mexico. The previous discharge plan was designated GW-9 and is now the responsibility of and is being renewed by Phillips 66 Natural Gas Company. The Mainline Engine Room remains the responsibility of El Paso Natural Gas Company and the portions of the previous discharge plan pertaining to the Mainline Engine Room are being renewed under Discharge Plan GW-46. Approximately 17,000 gallons per day of cooling tower wastewater with a total dissolved solids concentration of approximately 1300 mg/l is disposed of in an OCD approved contract disposal well. The discharge plan addresses how spills, leaks and other discharges to the ground at the plant will be managed. The groundwater most likely to be affected by any discharges at the surface is at a depth ranging from 80 to 150 feet with total dissolved solids concentrations from 1000 to 1700 mg/l.

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 21st day of October. To be published on or before November 4, 1988.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
s/WILLIAM J. LEMAY, Director
Journal, October 30, 1988

NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY, MINERALS AND
NATURAL RESOURCES DEPT
OIL CONSERVATION DIV
Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan has been submitted for renewal to the Director of the Oil Conservation Division, State Land Office Building, 310 Old Santa Fe Trail, Room 206, Santa Fe, New Mexico 87503, Telephone (505) 827-5800:

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(GW-9) Phillips 66 Natural Gas Company, Michael D. Ford, Environmental Analyst, 4001 Penbrook, Odessa, Texas, 79762 has submitted an application for renewal of the previously approved discharge plan for its Eunice EP Gas Plant located approximately 8 miles northwest of the city of Eunice in the NW/4 of Section 5, Township 21 South, Range 36 East (NMPM), Lea County, New Mexico. The previous discharge plan was approved for El Paso Natural Gas Company and was transferred to Phillips 66 Natural Gas Company at the time of ownership transfer. The Mainline Engine Room portion of the facility will remain the responsibility of El Paso Natural Gas Company and the portion of the original discharge plan pertaining to the Mainline Engine Room will be renewed under a new discharge plan designation (GW-46). Approximately 44,100 gallons per day of process wastewater with a total dissolved solids concentration of 1300 mg/l is disposed of in an OCD approved contract disposal well. The discharge plan addresses how spills, leaks and other discharges to the ground at the plant will be managed. The groundwater most likely to be affected by any discharge to the surface is at a depth ranging from 80 to 150 feet with total dissolved solids concentrations from 1000 to 1700 mg/l.

(GW-10) El Paso Natural Gas Company, Charles W. Hagen, Vice President, South Region, P.O. Box 1492, El Paso, Texas, 79978, has submitted an application for renewal of its previously approved discharge plan for its Jal No. 3 Gas Plant

MEXICO } ss

lo
S J. SMITHSON

being duly sworn declares and

that I, **ADV. MGR.** of the Albuquerque Journal, and that this notice is published in accordance with the meaning of Session Laws of 1937, and that payment therefore has been made or that the notice, a copy of which is hereto attached, was published in its daily edition,

..... times, the first publication being on the 30..... day

....., 1988....., and the subsequent consecutive

....., 198.....

Thomas J. Smithson

Sworn and subscribed to before me, a Notary Public in and for the County of Bernalillo and State of New Mexico, this 31..... day of October....., 1988.

PRICE \$ 50.30.....

Statement to come at end of month.

ACCOUNT NUMBER CX0932.....

EDJ-15 (R-2/86)



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS
GOVERNOR

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

October 24, 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Charles W. Hagan,
Vice President, South Region
El Paso Natural Gas Company
P.O. Box 1492
El Paso, TX 79978

RE: Discharge Plan Renewals
GW-8, Monument
GW-10, Jal No. 3
GW-40, Eunice Mainline Engine
Room

Dear Mr. Hagan:

The Oil Conservation Division has received your applications dated September 23, 1988 for renewal of the above-referenced discharge plans. Part of the review process includes a visit to the facilities. Members of the Environmental Bureau's staff are planning a trip to southeast New Mexico for the latter part of November and would like to include a visit to the three facilities during that time. We will be finalizing our plans the first or second week of November and I will be contacting you concerning convenient times for the visit.

After the facility visits and further OCD review of the plans, specific comments and information can be exchanged. A public notice will be published on or before November 4, 1988.

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

Sincerely,

Roger C. Anderson
Environmental Engineer

RCA/ag

cc: Oil Conservation Division - Hobbs
Donald R. Payne - EPNG
Dr. Henry Van - EPNG

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

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan has been submitted for renewal to the Director of the Oil Conservation Division, State Land Office Building, 310 Old Santa Fe Trail, Room 206, Santa Fe, New Mexico 87503, Telephone (505) 827-5800:

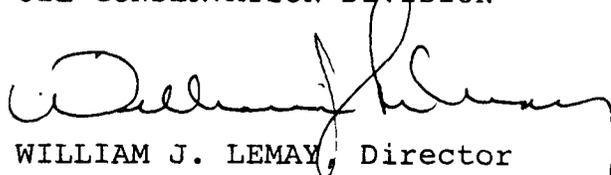
(GW-8) El Paso Natural Gas Company, Donald N. Bigbie, Vice President, North Region, P. O. Box 1492, El Paso, Texas, 79978, has submitted an application for renewal of its previously approved discharge plan for its Monument Gas Plant located approximately 3.5 miles southwest of the town of Monument in the NW/4 of Section 1, Township 20 South, Range 36 East (NMPM), Lea County, New Mexico. Approximately 9600 gallons per day of process wastewater with a total dissolved solids concentration of approximately 3500 mg/l is disposed of in an OCD approved contract disposal well. The discharge plan addresses how spills, leaks and other discharges to the ground at the plant will be managed. The groundwater most likely to be affected by any discharge to the surface is at a depth ranging from 35 to 60 feet with total dissolved solids concentrations from 500 to 3000 mg/l.

(GW-9) Phillips 66 Natural Gas Company, Michael D. Ford, Environmental Analyst, 4001 Penbrook, Odessa, Texas, 79762 has submitted an application for renewal of the previously approved discharge plan for its Eunice EP Gas Plant located approximately 8 miles northwest of the city of Eunice in the NW/4 of Section 5, Township 21 South, Range 36 East (NMPM), Lea County, New Mexico. The previous discharge plan was approved for El Paso Natural Gas Company and was transferred to Phillips 66 Natural Gas Company at the time of ownership transfer. The Mainline Engine Room portion of the facility will remain the responsibility of El Paso Natural Gas Company and the portion of the original discharge plan pertaining to the Mainline Engine Room will be renewed under a new discharge plan designation (GW-46). Approximately 44,100 gallons per day of process wastewater with a total dissolved solids concentration of 1300 mg/l is disposed of in an OCD approved contract disposal well. The discharge plan addresses how spills, leaks and other discharges to the ground at the plant will be managed. The groundwater most likely to be affected by any discharge to the surface is at a depth ranging from 80 to 150 feet with total dissolved solids concentrations from 1000 to 1700 mg/l.

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 21st day of October. To be published on or before November 4, 1988.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION



WILLIAM J. LEMAY, Director

S E A L

**DISCHARGE PLAN GW-46
RENEWAL APPLICATION
FOR
EL PASO NATURAL GAS CO.
EUNICE PLANT
MAINLINE ENGINE ROOM**



**LEA COUNTY, NEW MEXICO
OCTOBER, 1988**

DISCHARGE PLAN GW-46 RENEWAL APPLICATION

FOR

EL PASO NATURAL GAS COMPANY
EUNICE PLANT MAINLINE ENGINE ROOM
LEA COUNTY, NEW MEXICO

October 1988

Submitted to:

NEW MEXICO OIL CONSERVATION DIVISION
P.O. Box 2088
Santa Fe, New Mexico 87501

AFFIRMATION:

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



Signature
A. H. Carameros
Vice President

September 23, 1988

Date

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- B RESULTS OF DRAIN LINE TESTING

8 mi N of Eunice
NW 1/4

1.0 EXECUTIVE SUMMARY

El Paso Natural Gas Company, P.O. Box 1492, El Paso, Texas 79978, proposes to discharge approximately 6,205,000 gallons per year of wastewater to an internally and externally epoxy-coated steel tank-type classifier which is operated by Phillips. The wastewater from the classifier tank is pumped through an anthracite/rock filter and disposed in the Rice Engineering Disposal System, Monument Branch. The wastewater is generated at the Eunice Plant Mainline Engine Room which is located in Sections 5 and 6, T-21-S, R-36-E, Lea County, New Mexico. Approximately 99% of the wastewater is blowdown from the Mainline Engine Room's cooling tower, and 1% from domestic sewage and engine room drains.

Presently, the Mainline Engine Room discharges commingled wastewater into a wastewater classifier and its effluent is disposed in the Rice Engineering Disposal System. EPNG proposes to continue to discharge the Mainline Engine Room wastewater to the classifier and to dispose the effluent from this collection system to the Rice Engineering Disposal System.

EPNG is wholly committed to carrying out sound disposal practices and to this end submits the plan outlining the proposed procedures. Likewise, EPNG is committed to cooperating fully with NMOCD in honoring requests for additional information or clarification of existing information related to the Discharge Plan.

2.0 GENERAL INFORMATION

2.1 NAME OF DISCHARGER/LEGALLY RESPONSIBLE PARTY

All correspondence regarding this discharge plan should be sent to EPNG South Region headquarters at the address below:

Charles W. Hagen
Vice President
South Region
El Paso Natural Gas Company
P. O. Box 1492
El Paso, TX 79978
(915) 541-2600

2.2 LOCAL REPRESENTATIVE OR CONTACT

A copy of all correspondence and all questions should be directed to the South Region Compliance Engineer:

Donald R. Payne
El Paso Natural Gas Company
South Region
P. O. Box 1492
El Paso, TX 79978
(915) 541-5399

EPNG requests that copies of correspondence also be sent to:

Environmental and Safety Affairs
El Paso Natural Gas Company
P. O. Box 1492
El Paso, TX 79978
ATTN: H. Van
(915) 541-2832

2.3 LOCATION OF DISCHARGE

The Eunice Plant is located in Sections 5 and 6, T-21-S, R-36-E, Lea County, New Mexico, approximately 11 miles northwest of Eunice, New Mexico. Figures 1, 2 and 3 (pp. 3, 4, 5 and 6) of the 1983 Discharge Plan show the location of the plant.

2.4 LOCAL LAND USE

The Eunice Plant occupies approximately 12 acres and can be seen in the 1981 aerial photograph in Figure 2 of the 1983 Discharge Plan. However, the Plant does not have the 60-house camp for the employees. This camp has been closed permanently, and the houses have been removed.

Information regarding land ownership is contained in Figure 3 (pp. 5 and 6) of the 1983 Discharge Plan.

2.5 DESCRIPTION OF OPERATIONS

El Paso Natural Gas Company's Eunice Plant is engaged in the compression of natural gas. The plant has been sold to Phillips Natural Gas Company with the exception of the Mainline Engine Room.

The Eunice Mainline Compressor Room (EMER) has twelve gas fueled engine driven compressor units totaling 12,100 horsepower with a designed natural gas handling capacity of 344 million cubic feet per day. Entrained liquids are removed from the gas stream prior to compression by two horizontal gas-liquid scrubbers. The compressed gas passes through cooling coils in a mechanical draft cooling tower, then through twelve small gas-liquid scrubbers. The primary purpose of the separators is to remove any small

quantities of liquids from the gas stream prior to entering the mainline transportation system.

2.6 REGULATORY INDEX

Table 2-1 presents the regulatory index. This table provides a cross reference between WQCC Regulations and this discharge plan.

**TABLE 2-1
REGULATORY INDEX**

<u>WQCC Regulation Required in Discharge Plan</u>	<u>Section in Discharge Plan</u>
1-201	1.0, 2.0
1-202	3.2.3
1-203	3.3.4
3-106 C.1	3.2
3-106 C.2	2.3, Fig. 2-1, 5.3.2.
3-106 C.3	1.0, 5.3
3-106 C.4	5.4
3-106 C.5	3.0, 4.0
3-106 C.6	5.1
3-106 C.7	7.0
3-107	6.0
3-108.B	1.0
<u>NMOCD Regulation Required in Discharge Plan</u>	<u>Section in Discharge Plan</u>
116	3.3.4

3.0 EFFLUENT SOURCES, CHARACTERISTICS AND DISPOSAL

3.1 WASTE SOURCES, QUANTITY AND FLOW CHARACTERISTICS

3.1.1 GAS LIQUID SCRUBBERS

Wastewater discharge from the scrubbers is negligible.

3.1.2 COOLING TOWER BLOWDOWN

The mainline cooling tower blowdown is approximately 16,850 gallons per day, or 11.7 gallons per minute.

3.1.3 DOMESTIC SEWAGE

The domestic wastewater discharges from the four toilets is routed to an internally and externally epoxy-coated steel tank-type classifier. Figures 15 and 16 of the 1983 Discharge Plan show the existing wastewater-producing processes and schematic of the collection system. Although Phillips 66 Natural Gas Company owns the wastewater classifier system, El Paso Natural Gas Company (EPNG) has an agreement with Phillips to discharge the domestic wastewater and the gas-liquid separation waste to the classifier system described in the 1983 Discharge Plan.

3.1.4 STORM WATER

The arrangement of the wastewater collection/classifier system precludes the possibility of storm water run-off entering the system and appreciably changing the volume of discharge. No open drains which collect storm water are connected to the system.

3.2 WASTE QUANTITY AND FLOW CHARACTERISTICS

3.2.1 GAS-LIQUIDS SCRUBBERS

The inlet mainline gas is treated by the scrubber units which discharge negligible amounts of wastewater. This wastewater is discharged to the Phillips 66 Natural Gas Company wastewater classifier.

3.2.2 COOLING TOWER BLOWDOWN

Evaporative cooling tower water is used to cool compressed pipeline gas for transmission. Cooling tower water is recycled as much as possible, but some is blowdown and replaced to prevent TDS buildup. The blowdown is approximately 16,850 gallons per day, or 11.7 gallons per minute.

3.2.3 DOMESTIC SEWAGE

About 150 gpd are generated from the four restrooms. The domestic sewage discharges to the classifier system.

3.2.4 STORM WATER

Storm water is collected in open drains and discharged to grade.

3.2.5 WASTEWATER ANALYSIS

Table 3 (p. 20) of the 1983 Discharge Plan contains the wastewater analyses for the composite samples. However, these results reflect the quality of the composite sample taken in July 1983. But there is no reason to believe that the character of this waste stream has changed, especially the wastewater stream from the Mainline Engine Room.

3.3 SPILL/LEAK PREVENTION AND HOUSEKEEPING PRACTICES

3.3.1 OPERATING AND MAINTENANCE PROCEDURES

The Eunice Mainline Engine Room is operated in a manner to prevent and mitigate any unplanned releases to the environment. EMER processes are regularly observed by a number of personnel during daily operations, and any evidence or sign of spills or leaks are routinely reported to supervisory personnel so that repairs or cleanup can be promptly effected. Routine maintenance procedures conducted at the EMER also help to assure that equipment remains functional and minimize the possibility of spills or leaks.

3.3.2 CHEMICAL AND ENVIRONMENTAL HAZARDS

Process and non-process chemicals or additives (Table 3-1) used at the EMER could present a threat to the environment only in the event of a major spill or release. Appendix A contains the new Safety Material Data Sheets for chemicals now being used not listed in the 1983 Discharge Plan. The majority of the chemicals are used in small quantities (25 gallons to 4,000 gallons per year). Hence any spills or leaks would be very small in volume and easily contained in the immediate area.

3.3.3 CLEANUP PROCEDURES

Cleanup procedures would obviously vary with the nature and extent of any unplanned release. Spills of acids are relatively easy to control and general procedures would include neutralization of the material in-place before a final evaluation is made on its ultimate disposal. Once neutralization is confirmed by sampling and pH determination, it is quite probable

that no further actions would be required to ensure protection of human health and the environment.

Spills or leaks of hydrocarbons could potentially occur from the lube oil, or waste oil storage tanks. Lube oil is stored in a 24,000 gallon above-ground horizontal tank. The location of these drums and the structures in the area would preclude any releases from reaching natural drainage.

TABLE 3-1
CHEMICALS USED AT EUNICE PLANT MAINLINE ENGINE ROOM
(AVERAGE ANNUAL AMOUNTS)

COOLING TOWERS		
✓ Antipol - 662	Anti-corrosion	2,080 lbs
✓ Toxene 35	Biocide	30 gal
Toxene 37	Biocide	30 gal
✓ Chlorine	Hydpochlorite-biocide	1,000 lbs
✓ Hydrochem D-300	Dispersant	548 gal
Hydrochem A-239 <i>incomplete</i>		5 gal
CLOSED JACKET AND OIL COOLING WATER SYSTEM		
✓ Chromine T	Anti-corrosion	50 gal
LUBE OIL		
✓ Mobil Pegasus 490	Engine Crankcase	25,000 gal
✓ Molylube 890	Air Compressor	42 gal
DEGREASER		
✓ Varsol	General Purpose Degreaser	1,000 gal

3.3.4 REPORTING

Should a release of materials occur, EPNG will provide verbal notification to NMOCD as soon as possible after discovery as required by NMOCD and WQCC Regulation 116 and 1-203, respectively.

3.3.5 GENERAL HOUSEKEEPING PROCEDURES

EPNG strives to reduce the potential for spills and leaks in all areas. Existing records and interviews with plant personnel indicate that no reportable spills have occurred at Eunice Plant.

Non-process chemicals are used in relatively small quantities at the Plant and are managed in a manner to prevent discharges to the environment. Any chemical spills which might occur would be immediately contained and disposed of according to proper guidelines.

Chemicals such as cleaning solvents are collected and recycled. EPNG currently uses a non-halogenated solvent, Varsol is used for degreasing operations. Used Varsol is discharged to the classifier.

4.0 EFFLUENT DISPOSAL

4.1 EXISTING OPERATIONS

EPNG disposes of all industrial aqueous wastes in an on-site internally and externally epoxy-coated steel tank-type classifier. Figures 15 and 16 (pp. 32 and 33) of the 1983 Discharge Plan show the existing wastewater-producing processes and the collection system in schematic forms. No changes have been made to this system since 1983.

4.2 OFF-SITE DISPOSAL

Industrial and domestic refuse generated in the EMER is being pumped through an anthracite/rock filter, then metered and disposed of in the Rice Engineering Disposal System, Monument Branch. El Paso began delivering wastewater to the Rice Engineering system on October 26, 1982. The industrial solid waste is comprised of used oil filters from compressor engines and office garbage. All the solid waste is hauled and disposed in the City of Hobbs landfill.

4.3 PROPOSED MODIFICATIONS

EPNG proposes to continue to discharge its wastewater generated at the Eunice Plant Mainline Engine Room to the classifier located on the Plant property and the classifier effluent discharged to Rice Engineering Disposal System, Monument Branch.

5.0 SITE CHARACTERISTICS

Site characteristics of the area where the Eunice Plant Mainline Engine Room is are described in the 1983 Discharge Plan (pp. 39-46).

5.1 REGIONAL GEOLOGY

The regional geology is described in the 1983 Discharge Plan (pp. 39-45).

5.2 LOCAL GEOLOGY

The local geology is described in the 1983 Discharge Plan (pp. 39-46).

5.3 REGIONAL AND LOCAL HYDROLOGY AND GROUNDWATER QUALITY

The regional and local hydrology and groundwater quality is discussed in the 1983 Discharge Plan (pp. 21-26).

5.4 SURFACE WATER HYDROLOGY AND FLOODING POTENTIAL

The surface water hydrology and flooding potential of the Eunice Plant Mainline Engine Room is described in the 1983 Discharge Plan (p. 23).

6.0 MONITORING AND REPORTING

Because the "discharge site" is under the care and control of Rice Engineering, El Paso will perform the following evaluation to ensure that the wastewater collection systems operated by El Paso in the Plant do not also become "discharge sites." The Plant underground drain systems (shown in Figure 22 of the 1983 Discharge Plan, Map Pocket) will be tested to ensure the integrity of the drain system. Appendix B contains the 1988 results of the pressure testing of the drain lines. Test procedures are structured so that each line is pressure tested for a specified time period to verify that no line is leaking. Any leaks identified will be repaired. The drain line test procedure is found in Appendix J of the 1983 Discharge Plan.

Annual sampling and analysis of the wastewater stream (classifier effluent) delivered to the disposal system will be conducted and a Plant file maintained. A monthly report to NMOCD on Form C 120-8, describing disposal volumes, is now being submitted. The wastewater flow records will be periodically reviewed to determine if any unexplained changes in disposal volumes have developed. If any such anomalies occur, an inspection of the collection system will be conducted to identify the cause. Any records related to integrity testing and waste characteristics will be retained by El Paso for five years.

Sludge will be removed from the cooling tower basin and the classifier as needed and will be evaluated and disposed of in an approved landfill. Any changes, anticipated or otherwise, to the disposal system will, of course, be reported to NMOCD.

7.0 BASIS FOR APPROVAL

The existing site conditions and proposed continued use of the present wastewater disposal system at the EPNG EMER act together to ensure that there will be no present or future adverse effects

to groundwater as a result of discharges to existing wastewater management units. No present or future users of groundwater in the EMER area would be affected by the facility's waste management practices for the following reasons:

- o EPNG proposed to continue using existing waste management units and their effluent discharged to the Rice Engineering Disposal System, Monument Branch.
- o There is no significant potential for wastewater release due to flooding by a 100-year storm (1983 Discharge Plan, p. 23).

8.0 REFERENCES CITED

EPNG Discharge Plan for Eunice Plant, Lea County, New Mexico, August 1983.

APPENDIX A

APPENDIX A

MATERIAL SAFETY DATA SHEETS



EPN G Code
Drums = 053-0523-100
5 gal can 053-0523-200

Continental Products of Texas

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

Hydrochem A-239

SECTION I - IDENTIFICATION

TRADE NAME..... Hydrochem A-239
REVISED DATE..... February 4, 1988
CHEMICAL NAME..... Aqueous Mixture
CAS NUMBER..... Not Appropriate
OSHA HAZARD CLASS..... Physical hazard - Corrosive, Health hazard - Eye hazard, Skin hazard, Kidney toxin.
EPA HAZARD DATAGORY..... Immediate (acute) health hazard.- Corrosive
DOT LABEL REQUIRED..... Corrosive
EMERGENCY PHONE NUMBER... 1-800-592-4684 OR 1-915-337-4681

SECTION II - HAZARDOUS INGREDIENTS

HAZARDOUS COMPONENTS	HAZARDOUS %	HAZARDOUS COMPONENT DATA
Isopropyl Alcohol (CAS# 67-63-0)	Conf.	OSHA (PEL): TWA = 400 ppm, 980 mg/m ³ . ACGIH (TLV): TWA = 400 ppm, 980 mg/m ³ , STEL = 500 ppm, 1,225 mg/m ³ .

SECTION III - PHYSICAL DATA

BOILING POINT..... 218 Deg F
VAPOR PRESSURE (mm Hg)... 25
SOLUBILITY IN H₂O..... Completely soluble
APPEARANCE/ODOR..... Brown liquid / Pungent odor
SPECIFIC GRAVITY (H₂O=1). 1.1
VOLATILITY/VOL(%)..... 60
PH OF SOLUTION..... 2 to 3

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

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

D.O.T. Information

Shipping Name: Compound, Water treating

Hazard Class: Corrosive Liquid

I.D. # NA 1760

Wt. 55 gal Drum = 511 #
5 gal can = 50 #



Continental Products of Texas

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

Hydrochem A-239

SECTION VII - SPILL OR LEAK PROCEDURE

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

SECTION VIII - SPECIAL PROTECTION

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

SECTION IX - SPECIAL PRECAUTIONS

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

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

MOBIL OIL CORPORATION MATERIAL SAFETY DATA BULLETIN

REVISED: 08/23/83

***** I. PRODUCT IDENTIFICATION *****
MOBIL PEGASUS 485

SUPPLIER: MOBIL OIL CORP. HEALTH EMERGENCY TELEPHONE: (212) 883-4411
CHEMICAL NAMES AND SYNONYMS: PET. HYDROCARBONS AND ADDITIVES TRANSPORT EMERGENCY TELEPHONE: (800) 424-9300 (CHEMTREC)
USE OR DESCRIPTION: INDUSTRIAL LUBRICANT PRODUCT TECHNICAL INFORMATION: (800) 662-4525

***** II. TYPICAL CHEMICAL AND PHYSICAL PROPERTIES *****

APPEARANCE: ASTM 5.0 LIQUID ODOR: MILD PH: NA
VISCOSITY AT 100 F, SUS: 650.0 AT 40 C, CS: 72.0
VISCOSITY AT 210 F, SUS: 70.0 AT 100 C, CS: 13.0
FLASH POINT F(C): 480(249) (ASTM D-92)
MELTING POINT F(C): NA POUR POINT F(C): 10(-12)
BOILING POINT F(C): > 600(316)
RELATIVE DENSITY, 15/4 C: 0.89 SOLUBILITY IN WATER: NEGLIGIBLE
VAPOR PRESSURE-MM HG 20C: < .1
NA=NOT APPLICABLE NE=NOT ESTABLISHED D=DECOMPOSES
FOR FURTHER INFORMATION, CONTACT YOUR LOCAL MARKETING OFFICE.

***** III. INGREDIENTS *****

	WT PCT (APPROX)	EXPOSURE LIMITS (MG/M3)	SOURCES (PPM AND NOTES)
HAZARDOUS INGREDIENTS:			
NONE			
OTHER INGREDIENTS:			
REFINED MINERAL OILS	>90		
ADDITIVES AND/OR OTHER INGREDIENTS	<10		

KEY TO SOURCES: A=ACGIH-TLV, A*=SUGGESTED-TLV, M=MOBIL, O=OSHA
NOTE: LIMITS SHOWN FOR GUIDANCE ONLY. FOLLOW APPLICABLE REGULATIONS.

***** IV. HEALTH HAZARD DATA *****

--- INCLUDES AGGRAVATED MEDICAL CONDITIONS, IF ESTABLISHED ---
EFFECTS OF OVEREXPOSURE: NOT EXPECTED TO BE A PROBLEM.

***** V. EMERGENCY AND FIRST AID PROCEDURES *****

--- FOR PRIMARY ROUTES OF ENTRY ---
EYE CONTACT: FLUSH WITH WATER.
SKIN CONTACT: WASH CONTACT AREAS WITH SOAP AND WATER.
INHALATION: NOT EXPECTED TO BE A PROBLEM.
INGESTION: NOT EXPECTED TO BE A PROBLEM. HOWEVER, IF GREATER THAN 1/2 LITER (PINT) INGESTED, IMMEDIATELY GIVE 1 TO 2 GLASSES OF WATER AND CALL A PHYSICIAN, HOSPITAL EMERGENCY ROOM OR POISON CONTROL CENTER FOR ASSISTANCE. DO NOT INDUCE VOMITING OR GIVE ANYTHING BY MOUTH TO AN UNCONSCIOUS PERSON.

***** VI. FIRE AND EXPLOSION HAZARD DATA *****

FLASH POINT F(C): 480(249) (ASTM D-92)
FLAMMABLE LIMITS. LEL: .6 UEL: 7.0
EXTINGUISHING MEDIA: CARBON DIOXIDE, FOAM, DRY CHEMICAL AND WATER FOG.
SPECIAL FIRE FIGHTING PROCEDURES: FOR FIRES IN ENCLOSED AREAS,
FIREFIGHTERS MUST USE SELF-CONTAINED BREATHING APPARATUS.
UNUSUAL FIRE AND EXPLOSION HAZARDS: NONE
NFPA HAZARD ID: HEALTH: 0, FLAMMABILITY: 1, REACTIVITY: 0

***** VII. REACTIVITY DATA *****

STABILITY (THERMAL, LIGHT, ETC.): STABLE
CONDITIONS TO AVOID: EXTREME HEAT
INCOMPATIBILITY (MATERIALS TO AVOID): STRONG OXIDIZERS
HAZARDOUS DECOMPOSITION PRODUCTS: CO.
HAZARDOUS POLYMERIZATION: WILL NOT OCCUR

***** VIII. SPILL OR LEAK PROCEDURE *****

ENVIRONMENTAL IMPACT: REPORT SPILLS AS REQUIRED TO APPROPRIATE
AUTHORITIES. U. S. COAST GUARD REGULATIONS REQUIRE IMMEDIATE
REPORTING OF SPILLS THAT COULD REACH ANY WATERWAY INCLUDING
INTERMITTENT DRY CREEKS. REPORT SPILL TO COAST GUARD TOLL FREE
NUMBER 800-424-8802.
PROCEDURES IF MATERIAL IS RELEASED OR SPILLED: ADSORB ON FIRE RETARDANT
TREATED SAWDUST, DIATOMACEOUS EARTH, ETC. SHOVEL UP AND DISPOSE OF
AT AN APPROPRIATE WASTE DISPOSAL FACILITY IN ACCORDANCE WITH
CURRENT APPLICABLE LAWS AND REGULATIONS, AND PRODUCT
CHARACTERISTICS AT TIME OF DISPOSAL.
WASTE MANAGEMENT: PRODUCT IS SUITABLE FOR BURNING IN AN ENCLOSED,
CONTROLLED BURNER FOR FUEL VALUE OR DISPOSAL BY SUPERVISED
INCINERATION. SUCH BURNING MAY BE LIMITED PURSUANT TO THE RESOURCE
CONSERVATION AND RECOVERY ACT. IN ADDITION, THE PRODUCT IS
SUITABLE FOR PROCESSING BY AN APPROVED RECYCLING FACILITY OR CAN BE
DISPOSED OF AT ANY GOVERNMENT APPROVED WASTE DISPOSAL FACILITY.
USE OF THESE METHODS IS SUBJECT TO USER COMPLIANCE WITH APPLICABLE
LAWS AND REGULATIONS AND CONSIDERATION OF PRODUCT CHARACTERISTICS
AT TIME OF DISPOSAL.

***** IX. SPECIAL PROTECTION INFORMATION *****

EYE PROTECTION: NO SPECIAL EQUIPMENT REQUIRED.
SKIN PROTECTION: NO SPECIAL EQUIPMENT REQUIRED. HOWEVER, GOOD PERSONAL
HYGIENE PRACTICES SHOULD ALWAYS BE FOLLOWED.
RESPIRATORY PROTECTION: NO SPECIAL REQUIREMENTS UNDER ORDINARY
CONDITIONS OF USE AND WITH ADEQUATE VENTILATION.
VENTILATION: NO SPECIAL REQUIREMENTS UNDER ORDINARY CONDITIONS OF USE
AND WITH ADEQUATE VENTILATION.

***** X. SPECIAL PRECAUTIONS *****

NO SPECIAL PRECAUTIONS REQUIRED.

***** XI. TOXICOLOGICAL DATA *****
 ---ACUTE---

ORAL TOXICITY (RATS): SLIGHTLY TOXIC (ESTIMATED) ---BASED ON TESTING OF SIMILAR PRODUCTS AND/OR THE COMPONENTS.

DERMAL TOXICITY (RABBITS): SLIGHTLY TOXIC (ESTIMATED) ---BASED ON TESTING OF SIMILAR PRODUCTS AND/OR THE COMPONENTS.

INHALATION TOXICITY (RATS): NOT APPLICABLE ---HARMFUL CONCENTRATIONS OF MISTS AND/OR VAPORS ARE UNLIKELY TO BE ENCOUNTERED THROUGH ANY CUSTOMARY OR REASONABLY FORESEEABLE HANDLING, USE, OR MISUSE OF THIS PRODUCT.

EYE IRRITATION (RABBITS): EXPECTED TO BE NON-IRRITATING. ---BASED ON TESTING OF SIMILAR PRODUCTS AND/OR THE COMPONENTS.

SKIN IRRITATION (RABBITS): EXPECTED TO BE NON-IRRITATING. ---BASED ON TESTING OF SIMILAR PRODUCTS AND/OR THE COMPONENTS.

---CHRONIC OR SPECIALIZED (SUMMARY)---

THE BASE OILS IN THIS PRODUCT ARE SEVERELY SOLVENT REFINED AND/OR SEVERELY HYDROTREATED. TWO YEAR MOUSE SKIN PAINTING STUDIES OF SIMILAR OILS SHOWED NO EVIDENCE OF CARCINOGENIC EFFECTS. SEVERELY SOLVENT REFINED AND SEVERELY HYDROTREATED MINERAL BASE OILS HAVE BEEN TESTED AT MOBIL ENVIRONMENTAL AND HEALTH SCIENCES LABORATORY BY DERMAL APPLICATION TO RATS 5 DAYS/WEEK FOR 90 DAYS AT DOSES SIGNIFICANTLY HIGHER THAN THOSE EXPECTED DURING NORMAL INDUSTRIAL EXPOSURE. EXTENSIVE EVALUATIONS INCLUDING MICROSCOPIC EXAMINATION OF INTERNAL ORGANS AND CLINICAL CHEMISTRY OF BODY FLUIDS, SHOWED NO ADVERSE EFFECTS.

***** XII. REGULATORY INFORMATION *****

TSCA INVENTORY STATUS: ALL COMPONENTS REGISTERED.

D.O.T. SHIPPING NAME: NOT APPLICABLE

D.O.T. HAZARD CLASS: NOT APPLICABLE

US OSHA HAZARD COMMUNICATION STANDARD: PRODUCT ASSESSED IN ACCORDANCE WITH OSHA CFR 1910.1200 AND DETERMINED NOT TO BE HAZARDOUS.

RCRA INFORMATION: THE UNUSED PRODUCT, IN OUR OPINION, IS NOT SPECIFICALLY LISTED BY THE EPA AS A HAZARDOUS WASTE (40 CFR, PART 261D); DOES NOT EXHIBIT THE HAZARDOUS CHARACTERISTICS OF IGNITABILITY, CORROSIVITY, OR REACTIVITY, AND IS NOT FORMULATED WITH THE METALS CITED IN THE EP TOXICITY TEST. HOWEVER, USED PRODUCT MAY BE REGULATED.

THE FOLLOWING PRODUCT INGREDIENTS ARE CITED ON THE LISTS BELOW:

CHEMICAL NAME	CAS NUMBER	LIST CITATIONS
ZINC (ELEMENTAL ANALYSIS) (0.025 PCT)	7440-66-6	15

--- KEY TO LIST CITATIONS ---

1 = OSHA Z, 2 = ACGIH, 3 = IARC, 4 = NTP, 5 = NCI,
 6 = EPA CARC, 7 = NFPA 49, 8 = NFPA 325M, 9 = DOT HMT, 10 = CA RTK,
 11 = IL RTK, 12 = MA RTK, 13 = MN RTK, 14 = NJ RTK, 15 = MI 293,
 16 = FL RTK, 17 = PA RTK.

--- NTP, IARC, AND OSHA INCLUDE CARCINOGENIC LISTINGS ---

INFORMATION GIVEN HEREIN IS OFFERED IN GOOD FAITH AS ACCURATE, BUT WITHOUT GUARANTEE. CONDITIONS OF USE AND SUITABILITY OF THE PRODUCT FOR PARTICULAR USES ARE BEYOND OUR CONTROL; ALL RISKS OF USE OF THE PRODUCT ARE THEREFORE ASSUMED BY THE USER AND WE EXPRESSLY DISCLAIM ALL WARRANTIES OF EVERY KIND AND NATURE, INCLUDING WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE IN RESPECT TO THE USE OR SUITABILITY OF THE PRODUCT. NOTHING IS INTENDED AS A RECOMMENDATION FOR USES WHICH INFRINGE VALID PATENTS OR AS EXTENDING LICENSE UNDER VALID PATENTS. APPROPRIATE WARNINGS AND SAFE HANDLING PROCEDURES SHOULD BE PROVIDED TO HANDLERS AND USERS.

PREPARED BY: MOBIL OIL CORPORATION
ENVIRONMENTAL AFFAIRS AND TOXICOLOGY DEPARTMENT, PRINCETON, NJ
FOR FURTHER INFORMATION, CONTACT:
MOBIL OIL CORPORATION, PRODUCT FORMULATION AND QUALITY CONTROL
3225 GALLOWS ROAD, FAIRFAX, VA 22037 (703) 849-3265

***** APPENDIX *****
FOR MOBIL USE ONLY: (FILL NO: RN1022D1001) MHC: 1* 1* NA 0* 0* PPEC:
US83-002 APPROVE REVISED: 08/23/83

APPENDIX B

APPENDIX B
RESULTS
OF
DRAIN LINE TESTING

TO: Larry Meyer
FROM: Johnny M. Owen

DATE: September 21, 1988
PLACE: Pipeline Maintenance

RE: DRAIN LINE TESTS

JAL #3 Drain Lines

Replaced all bad pipe that was found during test of these lines. All drain lines were tested for one hour. All tests showed no leaks.

EUNICE PLANT Drain Lines

Replaced all bad pipe that was found during test of these lines. All drain lines were tested for one hour. All tests showed no leaks.

MONUMENT PLANT Drain Lines

All drain lines are in good shape at Monument. No pipe was replaced at this plant. All pipe was tested for one hour. All tests showed no leaks.



Johnny M. Owen

ps

cc: File

EUNICE DRAIN LINES

2" H.P. Blowdown - M/L Scrubber to Classifier

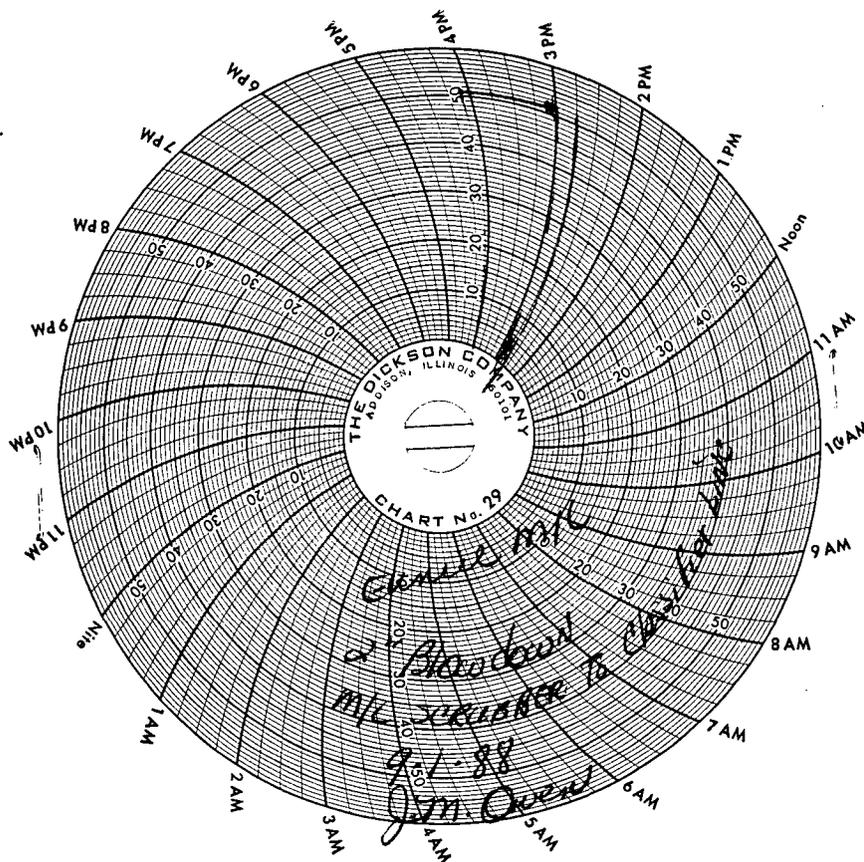
1. Close 2" valve on downstream side of regulator from scrubbers.
2. Install 2" Blind at check valve.

REMARKS: Fill and test line from location #2.

TEST PRESSURE: 50# for One Hour

DATE TESTED: September 1, 1988

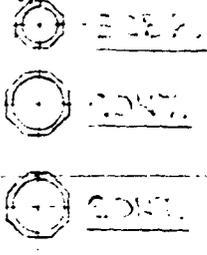
TESTED BY: Johnny M. Owen (EPNG)
Mike Hall (Merryman Const.)



HILLIPS
PROPERTY LINE

EST. VAL. SEC.
TR. #10
24

ABANDON



PIN FAN

2 1/2"



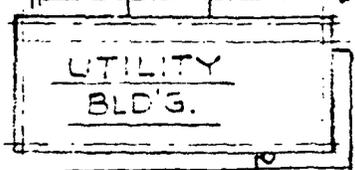
4" (ABANDON)

W. OUT
NATOR

TALK

ABANDON

ESD VOLUME
BOTTLES



2" PVC

NUMBER OF
IN ESD VOLUME

EUNICE DRAIN LINES

2" ESD Blowdown (North Bottle)

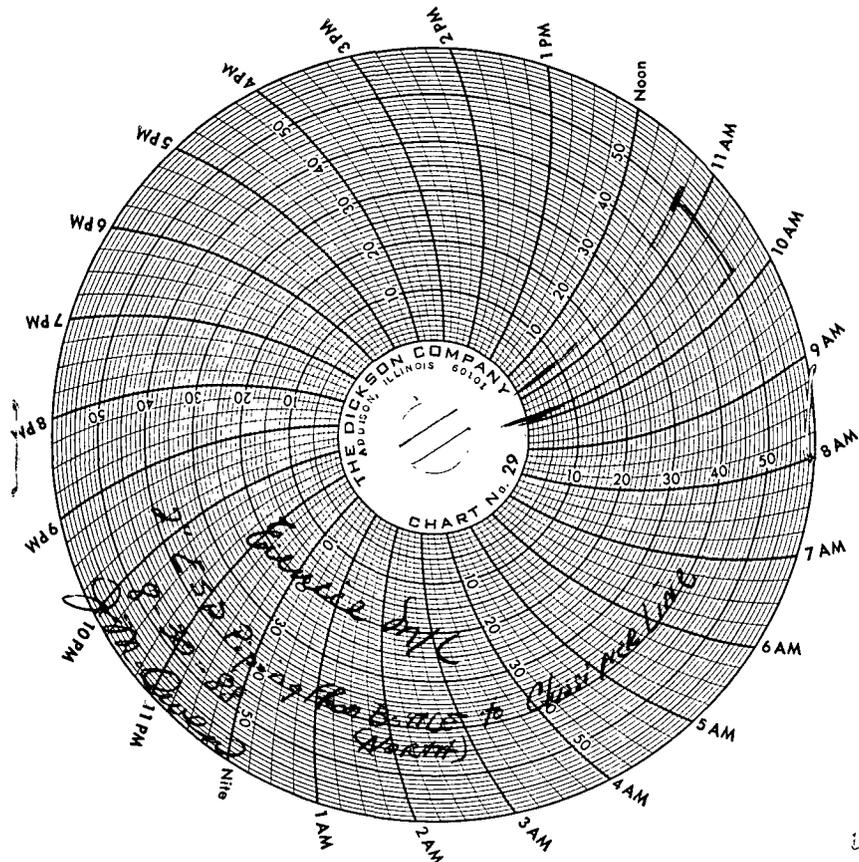
1. Close 2" valve located in box.
2. Install blind 2" - 150# Flanges.
Flanges are located in valve box approx. 16' south, 30' east of Valve #1.

REMARKS: Fill line from Location #2, purge air from Location #1.

TEST PRESSURE: 50# for One Hour

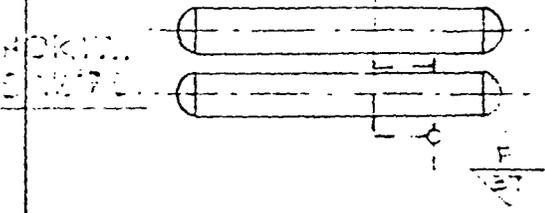
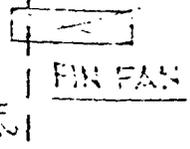
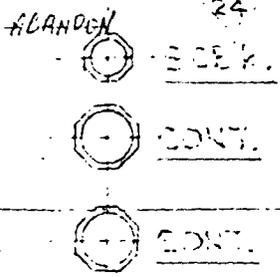
DATE TESTED: August 30, 1988

TESTED BY: Johnny M. Owen - EPNG
Mike Hall - Merryman Const.



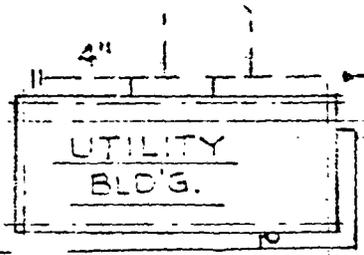
HILLIPS
PROPERTY LINE

ESD VALVE
TK. #10



4" (ABANDON)

Abandon



ESD VOLUME
BOTTLES

2" PVC

IN BLD'G.

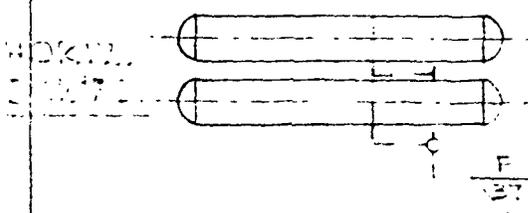
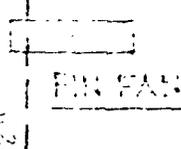
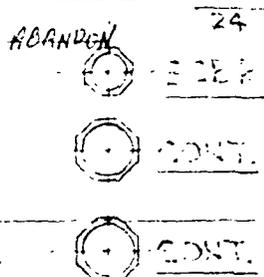
W/OUT
WATCH
TANK

8

ICS
PROPERTY LINE

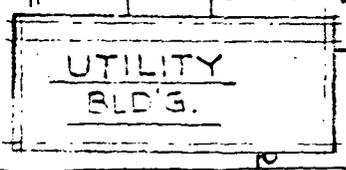
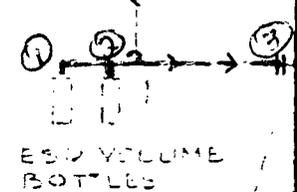
2" PVC
2" PVC

ESD VOLUME
10 1/2
24



4" (ABANDON)

Abandon



2" PVC

EUNICE DRAIN LINES

4" L.P. from Phillips Water Treating Plant to Classifier Line

1. Blind 6" flanges - (Fill & test from this point).
2. Close 2" Valve off starting air tank.
3. Plug line off starting air tank.
4. Plug 4" funnel drain.
5. Close 1" valve at air condensate tank at utility building.
6. Close 1/2 valve on east side of utility building.
7. Pull trap and plug 4" plastic sewer line.
8. Blind 6" flanges.

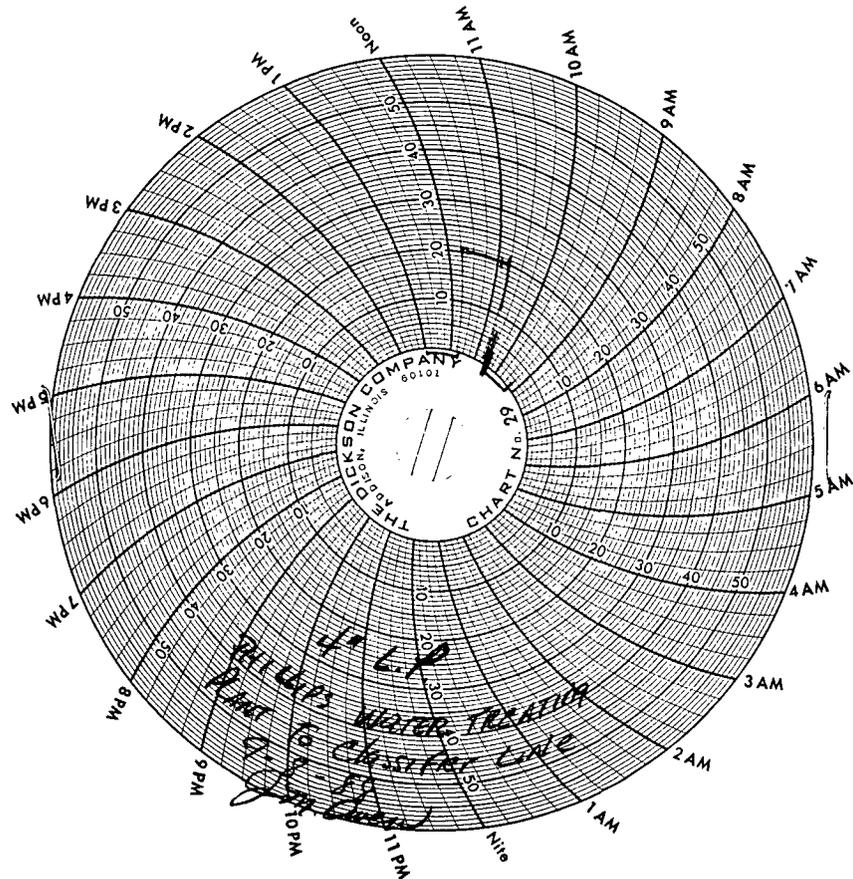
REMARKS: This line was originally 6" steel line. It was replaced with 4" Schedule 80 plastic pipe. There is a 12" trap starting at sewer line and running north.

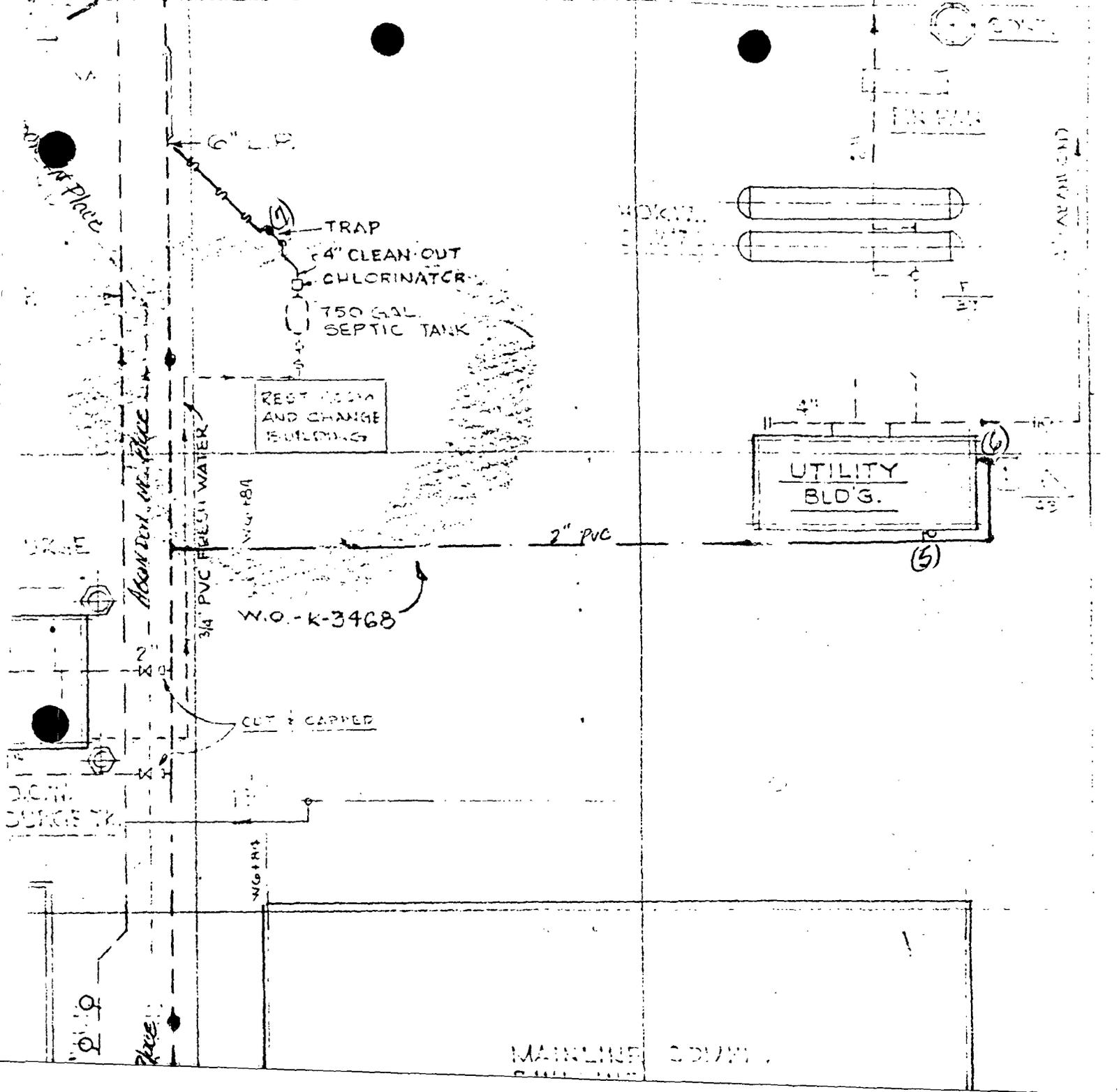
TEST PRESSURE: 20# for One Hour

TEST DATE: September 8, 1988

TESTED BY: Johnny M. Owen (EPNG)

Mike Hall (Merryman Const.)





EUNICE DRAIN LINES

6" L.P. from Apron Drains to Classifier Lines

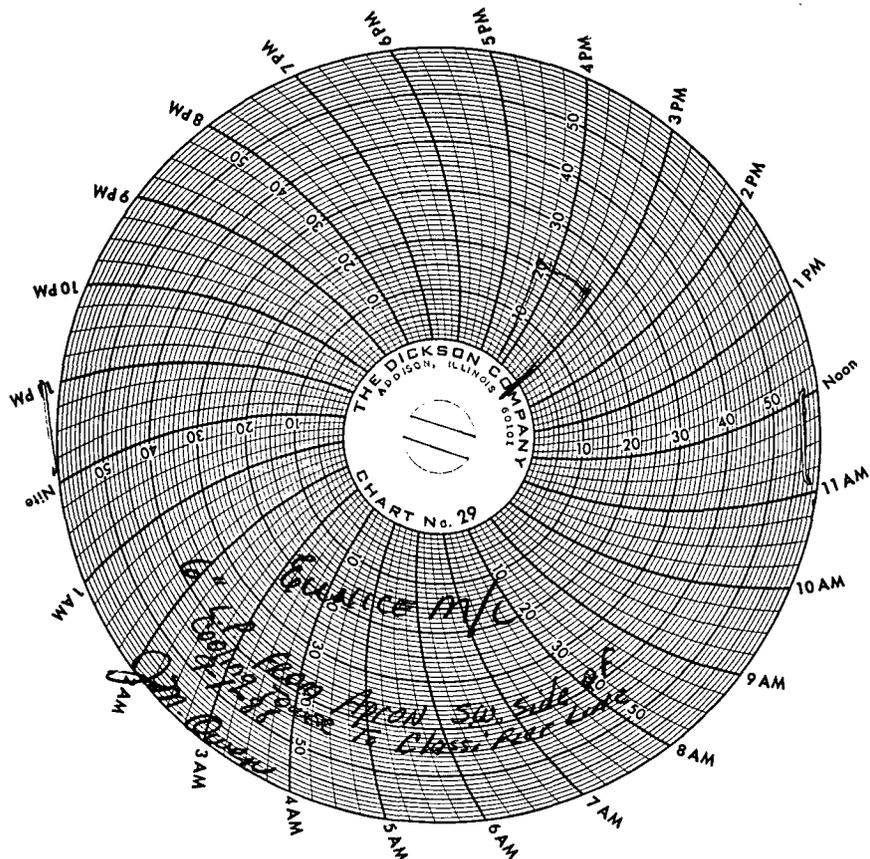
1. Blind apron drain - 4" flanges are located approx. 1' off apron.
2. Install expandable plug in apron drain from cooling tower blowdown.
3. Install 6" blind at Junction of sewer line & 6" blowdown line.
4. Install 6" blind at junction of classifier line (located in valve box).

REMARKS: Sewer line comes from bathroom on south side of compressor building. It is 6" clay tile line. This line has to be out of service during test. Fill line from this point.

TEST PRESSURE: 20# for One Hour

DATE TESTED: September 1, 1988

TESTED BY: Johnny M. Owen - EPNG
Mike Hall - Merryman Const.



Eunice Drain Lines

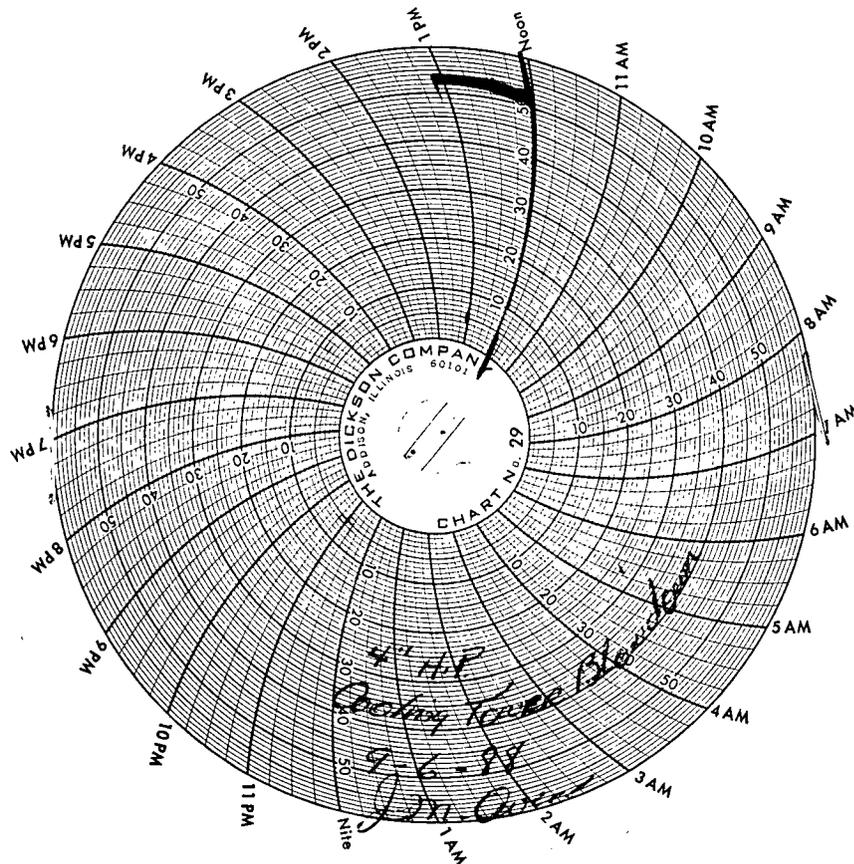
4" H.P. Cooling Tower Blowdown to Classifier Line

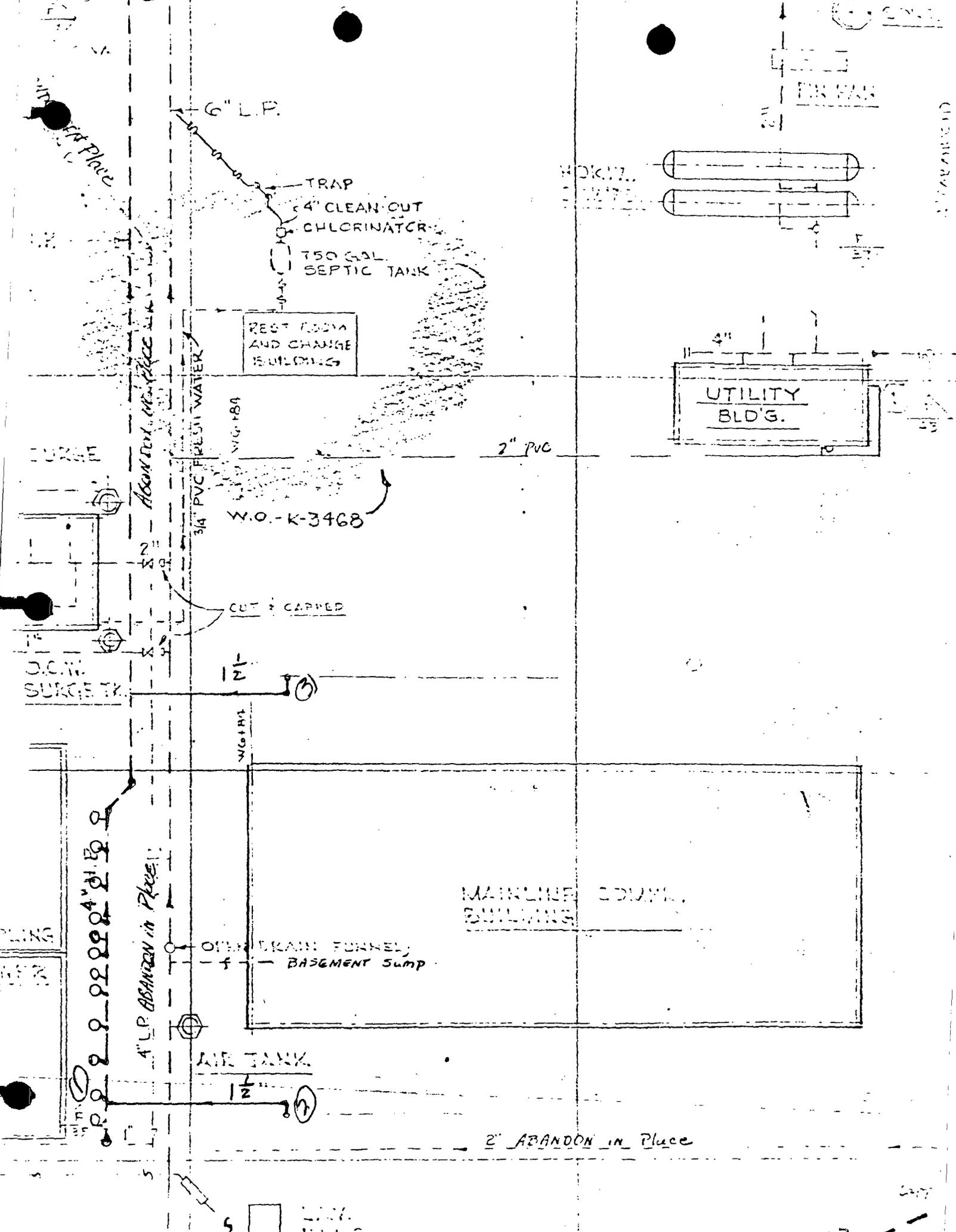
1. Plug 12 pots coming off cooling tower - 12 - 1" Plugs.
All of these pots have valves.
2. Close 1½ valve.
3. Close 1½ valve.
4. Blind 4" Flanges.

TEST PRESSURE: 50# for one hour

DATE TESTED: September 6, 1988

TESTED BY: Johnny M. Owen - EPNG
Mike Hall - Merryman Const.





6" L.P.

TRAP
 4" CLEAN-OUT
 CHLORINATOR
 750 GAL.
 SEPTIC TANK

REST ROOM
 AND CHANGE
 BUILDING

UTILITY
 BLD'G.

2" PVC

W.O.-K-3468

CUT & CAPPED

1/2"

MAINLINE BUILDING

OPEN DRAIN FUNNEL
 - BASEMENT SUMP

AIR TANK

1/2"

2" ABANDON in Place

4" L.P. ABANDON in Place

4" H.P. ABANDON in Place

ABANDON in Place

3/4" PVC PRESS. WATER

W.O.-K-3468

W.O.-K-3468



STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS
GOVERNOR

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

April 6, 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John C. Bridges, Manager
Environmental Engineering
El Paso Natural Gas Co.
P. O. Box 1492
El Paso, Texas 79978

RE: Discharge Plan GW-46
Eunice Gasoline Plant
Mainline Engine Room
Lea County, New Mexico

Dear Mr. Bridges:

On October 11, 1983, the ground water discharge plan, GW-9, for the Eunice Gasoline Plant located in Lea County was approved by the Director of the Oil Conservation Division (OCD). This discharge plan was required and submitted pursuant to Water Quality Control Commission Regulations and it was approved for a period of five years. The approval will expire on October 11, 1988. On January 5, 1987 this discharge plan was transferred to Phillips 66 Natural Gas Company with the exception of the "Mainline Engine Room." The OCD will separate the discharge plan into two parts. GW-9 will refer to the processing plant with renewal and compliance with the terms and conditions of the processing plant discharge plan the responsibility of Phillips 66 Natural Gas Company. GW-46 will refer to the mainline engine room with renewal and compliance with the terms and conditions of the "Mainline Engine Room" discharge plan the responsibility of El Paso Natural Gas Company.

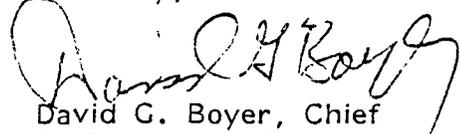
If your section of the facility continues to have effluent or leachate discharges and you wish to continue discharging, please submit your application for renewal of plan approval as quickly as possible. The OCD is reviewing discharge plan submittals and renewals carefully and the review time can often extend for several months. Please indicate whether you have made, or intend to make, any changes in your discharge system, and if so, include an application for plan amendment with your application for renewal. To assist you in preparation of your renewal application, I have enclosed a copy of the OCD's guidelines for preparation of ground water discharge plans at natural gas processing plants. These guidelines will be used in review of your renewal application.

Mr. John C. Bridges
April 6, 1988
Page 2

If you no longer have such discharges and discharge plan renewal is not needed, please notify this office.

If you have any questions, please do not hesitate to contact Roger Anderson at (505) 827-5885.

Sincerely,

A handwritten signature in cursive script, appearing to read "David G. Boyer".

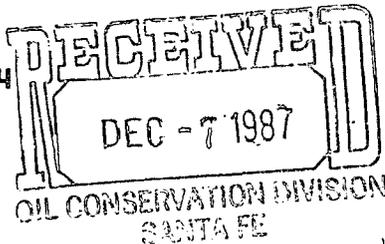
David G. Boyer, Chief
Environmental Bureau

DGB:sl

Enclosure

cc: OCD-Hobbs

El Paso
Natural Gas Company
November 30, 1987



P. O. BOX 1492
EL PASO, TEXAS 79978
PHONE: 915-541-2600

Mr. Roger Anderson
New Mexico Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87504-2088

Subject: Addition of Septic Tank at El Paso Natural
Gas Company's Eunice Plant, Lea County, NM

Dear Mr. Anderson:

On November 24, 1987 a call was made to David Boyer to find out the permit requirements for installing an underground septic tank at El Paso Natural Gas Company's Eunice Plant. He said that a leak detection system would not be required because the new tank is upstream of the point at which industrial waste is co-mingled with sewage. He also said that the discharge plan would not have to be revised because there is no net increase in sewage effluent or in-plant personnel.

I am also enclosing, at Mr. Boyer's request, a drawing showing the location of the proposed tank and another drawing showing the tank size and materials of construction. If you have any questions, please feel free to call me at 915/541-5341.

Very truly yours,

A handwritten signature in cursive script, appearing to read "L. E. Gearhart".

L. E. Gearhart, P. E.
Sr. Environmental Engineer
Environmental & Safety Affairs

ka

Enclosures

cc: David Boyer, NMOCD

*11/18/87
Forker Plaster
368-5875
Sims Plastics
Sims Plastics
Forker Plaster*

HANCOR

Superior in-ground performance and long life are built-in.

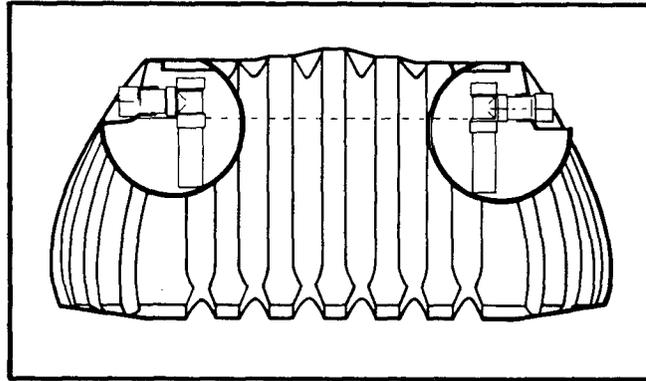
A product of computer modeling techniques, the Hancor polyethylene septic tank is designed and built to give years of trouble-free service. Hancor septic tanks will not rust, rot or corrode even without an external protective coating. They are ready for burial as delivered.

All Hancor septic tanks are subject to stringent laboratory conducted quality control checks, and every tank produced is individually checked for watertightness before shipment.

Their arch-shaped profile maximizes soil loading potential to resist flotation in wet or less cohesive

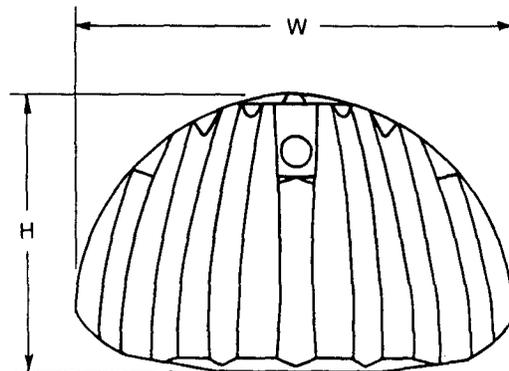
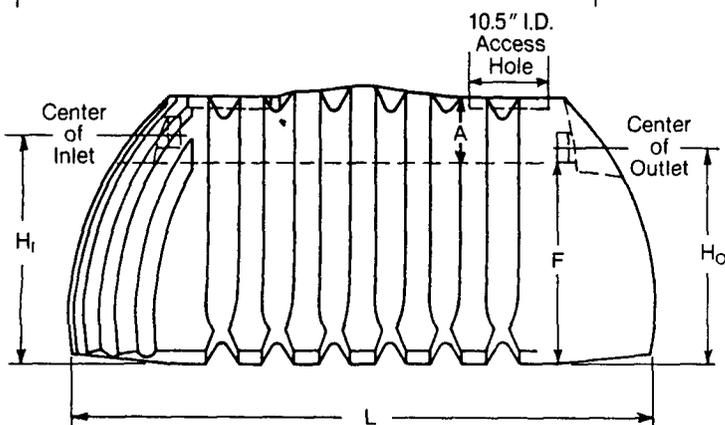
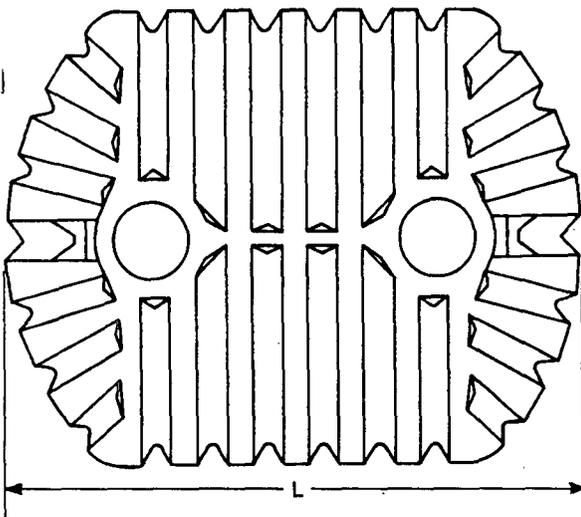
soils. Deeply formed corrugations and longitudinal ribs lend extra strength and stability.

Rotomolded, Hancor septic tanks are manufactured as single-piece units.



SPECIFICATIONS:

CODE	DESCRIPTION	500 GAL.	750 GAL.	1,000 GAL.
—	WEIGHT (lbs.)	185	245	300
L	LENGTH (in.)	90	92	115
H	HEIGHT (in.)	42	54	59
W	WIDTH (in.)	62	67	67
H _I	HEIGHT TO INLET \varnothing (in.)	34	45	48
H _O	HEIGHT TO OUTLET \varnothing (in.)	31	42	45
F	FLUID LEVEL (in.)	29	40	43
A	AIRSPACE (in.)	9.5	12	13.5



HANCOR SEPTIC TANK 3-Year Limited Warranty

Hancor, Inc., of 401 Olive Street, Findlay, Ohio 45840, warrants to the original purchaser, that its septic tank, when properly installed and properly maintained, will be free from defects in material and workmanship under normal use and service within three (3) years from the

date of manufacture.

The provisions of this LIMITED WARRANTY apply ONLY during the first THREE (3) years after the date of manufacture.

This LIMITED WARRANTY shall only be effective if the following conditions are met:

1. The septic tank must be installed and used in accordance with Hancor's instructions supplied with the tank. The tank must be buried underground and must be kept at least one-half full of water or sewage at all times.
2. The septic tank user must maintain written evidence of all maintenance done on the septic tank, including pumping to remove sludge accumulation.
3. The tank must be used as a septic/septage tank. Tanks used in non-septic applications are not covered by this LIMITED WARRANTY.
4. The owner registration card must be filled in and returned to Hancor within THIRTY (30) days from the date of purchase.

Hancor, Inc., will, if it's properly installed and maintained septic tank fails because of

defects in material or workmanship within three (3) years from the date of manufacture, at its election repair the defective septic tank or supply a new equivalent Hancor septic tank in replacement thereof.

In the event Hancor, Inc., is unable to provide a replacement septic tank and repair is not commercially practicable or cannot be timely made, Hancor, Inc., may refund the wholesale purchase price in lieu of repair or replacement. Hancor's liability is limited to the value of the tank itself and specifically excludes the costs of installation and/or removal and indirect or consequential damages.

Before any claims under this LIMITED WARRANTY will be considered by Hancor, Inc., notice of any defect must be given to Hancor, Inc., in writing. This written notice must be received by Hancor within a reasonable period of time after the defect becomes apparent. The written notice must include the serial number of the septic tank which can be found near the rims of the top access holes. The written notice should be

sent to Hancor, Inc., P.O. Box 1047, Findlay, Ohio 45839. Warranty matters may be discussed by calling the following number: (419) 422-6521.

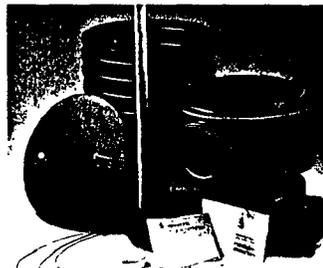
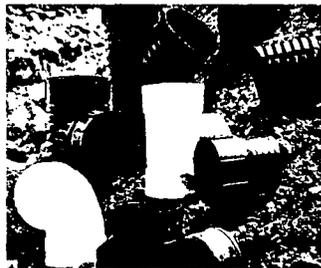
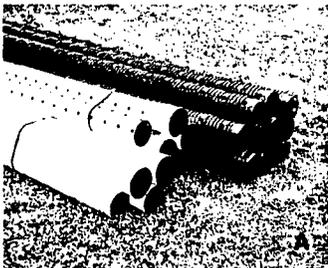
THERE ARE NO WARRANTIES WHICH EXTEND BEYOND THE DESCRIPTION ON THE FACE HEREOF. HANCOR, INC., DISCLAIMS ANY IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE.

IN NO EVENT SHALL HANCOR, INC., BE LIABLE TO THE PURCHASER OR ANY OTHER PERSON FOR INDIRECT OR CONSEQUENTIAL DAMAGES DUE TO BREACH BY HANCOR, INC., OF THIS WRITTEN LIMITED WARRANTY OR ANY IMPLIED WARRANTY.

Some states do not allow limitations on how long an implied warranty lasts and/or do not allow the exclusion or limitation of incidental or consequential damages, so the above limitations or exclusion may not apply to you.

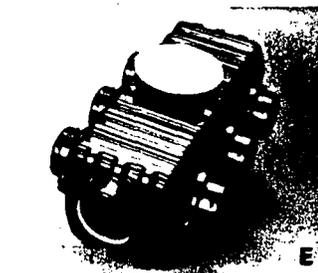
This warranty gives you specific legal rights, and you may also have other rights which vary from state to state.

HANCOR



Hancor waste water management products

- (A) Co-extruded SDR-38 Dual Wall Pipe and Corrugated Channelflow® tubing... all in self-coupling 10 feet lengths for fast system construction.
- (B) A variety of fittings are available for both Dual Wall Pipe and Channel-flow® Tubing.
- (C) Dual Chamber Alternator Valve for ground level switching of alternating disposal fields. Comes complete in kit form with extension tube and lid, hardware and installation instructions.
- (D) Standard Alternator Valve performs same function as deluxe unit above. A smaller, simpler valve, it also comes complete in kit form with instructions.
- (E) Distribution Box has outlets to accommodate up to 7 lines for maximum system design versatility. Inlet accepts both SCD-40 and sewer and drain pipe, PVC,



ABS, etc. Ground level extension and lid are optional.

- (F) Multi-Purpose Distribution Sump has unique "either end up" design and offset outlets which make it ideal as drop sump in hillside disposal fields and in many other waste management system applications.

HANCOR

Hancor, Inc., P.O. Box 1047, Findlay, Ohio 45839

California
P.O. Box 608, Patterson, CA 95363
(209) 892-3351

Indiana
P.O. Box 367, Brazil, IN 47834
(812) 446-2385

New York
P.O. Box 726, Union Station,
Endicott, NY 13760
(607) 748-7336
Outside NY (800) 847-5880

Texas
P.O. Box 271, Yoakum, TX 77995
(800) 242-3521
Outside TX (512) 293-6313

Georgia
P.O. Box 744, Cordele, GA 31015
(912) 273-1081
1-800-841-6500

Michigan
P.O. Box 8, Chesaning, MI 48616
(517) 845-2013
1-800-525-0052 (MI only)

North Carolina
P.O. Box 249
Mebane, NC 27302
(919) 563-5551

Washington
P.O. Box 352, Olympia, WA 98501
(800) 943-3313
1-800-654-5401 (WA only)
Outside WA (800) 544-1001

Iowa
P.O. Box 550, Oelwein, IA 50662
(319) 283-3324

Minnesota
P.O. Box 808, Fairmont, MN 56031
(507) 238-4791
1-800-862-5575 (MN only)
Outside MN (800) 533-0424

Ohio
P.O. Box 1047, Findlay, OH 45839
(800) 472-9557
Outside OH (800) 537-9520



STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

January 5, 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. J. C. Mikm, Agent
Permian Basin Region
Phillips 66 Natural Gas Co.
4001 Penbrook
Odessa, Texas 79762

Mr. C. W. Hagen, Vice Pres.
El Paso Natural Gas Co.
P. O. Box 1492
El Paso, Texas 79978

Re: Discharge Plan Transfer GW-9
Eunice Gasoline Plant
El Paso Natural Gas Co.
To Phillips 66 Natural Gas Co.

Gentlemen:

Pursuant to your request dated December 15, 1986, and Section 3-111 of the Water Quality Control Commission Regulations, effective December 31, 1986, responsibility for compliance of the terms and conditions of the approved Discharge Plan GW-9, Eunice Gasoline Plant, Lea County, New Mexico, is transferred from El Paso Natural Gas Company to Phillips 66 Natural Gas Company with the following exception:

1. Any spills, leaks, reporting requirements and disposal of any wastes generated in the "mainline engine room" will remain the responsibility of El Paso Natural Gas Company. EPNG must comply with the terms and conditions of discharge plan GW-9 as they apply to the "mainline engine room".

Please note that Section 3-104 of the regulations requires that "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3-107.C. you are required to notify the director of the facility expansion production increase, or process modification that would result in any significant modification in the discharge of water contaminants.

Discharge plan GW-9 was approved October 11, 1983 and will expire October 11, 1988, and application for renewal should be submitted in ample time for

review. Please be advised a requirement for renewal will be testing of all underground piping at facilities in excess of 25 years of age.

An inspection trip by members of the OCD staff will be scheduled with you in the near future.

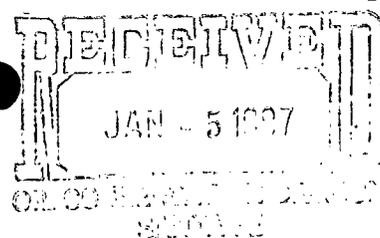
If there are any questions, please do not hesitate to call Dave Boyer at (505) 827-5812 or Roger Anderson at (505) 827-5885.

Sincerely,


CHARLES ROYBAL
Acting Director

CR:RCA:dp

cc: OCD-Hobbs



PHILLIPS 66 NATURAL GAS COMPANY

A SUBSIDIARY OF PHILLIPS PETROLEUM COMPANY

ODESSA, TEXAS 79762
4001 PENBROOK

December 15, 1986

Request for Discharge Plan Transfer
El Paso Natural Gas Co.,
Eunice Gasoline Plant to
Phillips 66 Natural Gas Co.

CERTIFIED MAIL
RECEIPT NO. P 140 239 509

Mr. Richard L. Stamets, Director
New Mexico Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87501

Dear Mr. Stamets:

This letter is written as a joint request by El Paso Natural Gas Company and Phillips 66 Natural Gas Company to transfer the approved discharge plan for El Paso's Eunice Plant to Phillips 66 Natural Gas Company, with one provision. This provision is El Paso will continue to operate and maintain what is referred to as their "mainline engine room". Wastes from the "mainline engine room" which are normally disposed of in the plant's waste system will continue to be disposed of in this manner. However, spill or leak clean-up from the "mainline engine room" and reporting requirements to the Oil Conservation Division will be the responsibility of El Paso Natural Gas Company.

This letter also serves as written notification the requirements of New Mexico Water Quality Control Commission Regulation 3 - 111, relating to transfer of discharge plans, has been met. Transfer of the facility operations is tentatively scheduled for December 31, 1986.

Questions regarding this request should be directed to Mr. John Cunningham, El Paso Natural Gas Co., at (915) 684-5701 or Mr. Mike Ford, Phillips Petroleum Co., at (915) 367-1316. Your timely response is appreciated.

Yours very truly,

J. C. Mihm
Agent, Permian Basin Region

C. W. Hagen
Vice President, El Paso Natural Gas Co.

JCM:MDF:gpp
MDF\ELPNW.1

El Paso
Natural Gas Company

P. O. BOX 1492
EL PASO, TEXAS 79978
PHONE: 915-541-2600

May 5, 1986

New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87501

Reference: Underground Storage Tank Notifications

Dear Sirs:

Enclosed please find copies of completed underground storage tank (UST) notifications for those tanks located at El Paso Natural Gas (El Paso) locations in New Mexico. Only those forms containing information on tanks related to activities associated with the exploration, development, or production of oil, gas or geothermal resources are included.

As you are well aware, one of the categories of tanks which are not required to be registered and are excluded according to specific statutory language are those at pipeline facilities (including gathering lines) regulated under the Natural Gas Pipeline Safety Act of 1968.

On the advice of El Paso's Legal Counsel, notification forms have been completed for all tanks which might otherwise be subject to the notification requirements and have been sent to the appropriate office of the Department of Transportation (DOT). DOT regulates all facilities which are used in the transportation of gas. All the above mentioned tanks meet the definition of equipment used in the transportation of gas. As a courtesy, copies of the completed forms being sent to DOT are enclosed.

Please note that each form includes the following disclaimer:

"The tank for which this registration is made is excluded from the registration requirement because it is a pipeline facility regulated under the Natural Gas Pipeline Safety Act of 1968. El Paso Natural Gas Company is providing this form to DOT as a courtesy with copies to the appropriate state agency."

New Mexico Oil Conservation Division

May 5, 1986

Page 2

Should you need further information please contact Howard Reiquam, Director of Environmental Affairs Department or myself at (915)541-3292 or 541-2869, respectively.

Very truly yours,

J.C. Bridges for JCB

John C. Bridges
Manager, Environmental Engineering
Environmental Affairs Department

JCB:gb

Notification for Underground Storage Tanks

FORM APPROVED
OMB NO. 2050-0049
APPROVAL EXPIRES 6-30-88

**FOR
TANKS
IN
NM**

**RETURN
COMPLETED
FORM
TO**

New Mexico Environmental Improvement Division
Ground Water/Hazardous Waste Bureau
P.O. Box 968 (505) 827-2933
Santa Fe, NM 87504 (505) 827-2918

STATE USE ONLY
I.D. Number
Date Received

GENERAL INFORMATION

Notification is required by Federal law for all underground tanks that have been used to store regulated substances since January 1, 1974, that are in the ground as of May 8, 1986, or that are brought into use after May 8, 1986. The information requested is required by Section 9002 of the Resource Conservation and Recovery Act, (RCRA), as amended.

The primary purpose of this notification program is to locate and evaluate underground tanks that store or have stored petroleum or hazardous substances. It is expected that the information you provide will be based on reasonably available records, or, in the absence of such records, your knowledge, belief, or recollection.

Who Must Notify? Section 9002 of RCRA, as amended, requires that, unless exempted, owners of underground tanks that store regulated substances must notify designated State or local agencies of the existence of their tanks. Owner means -

(a) in the case of an underground storage tank in use on November 8, 1984, or brought into use after that date, any person who owns an underground storage tank used for the storage, use, or dispensing of regulated substances, and

(b) in the case of any underground storage tank in use before November 8, 1984, but no longer in use on that date, any person who owned such tank immediately before the discontinuation of its use.

What Tanks Are Included? Underground storage tank is defined as any one or combination of tanks that (1) is used to contain an accumulation of "regulated substances," and (2) whose volume (including connected underground piping) is 10% or more beneath the ground. Some examples are underground tanks storing: 1. gasoline, used oil, or diesel fuel, and 2. industrial solvents, pesticides, herbicides, or fumigants.

What Tanks Are Excluded? Tanks removed from the ground are not subject to notification. Other tanks excluded from notification are:

1. farm or residential tanks of 1,100 gallons or less capacity used for storing motor fuel for noncommercial purposes;
2. tanks used for storing heating oil for consumptive use on the premises where stored;
3. septic tanks;

4. pipeline facilities (including gathering lines) regulated under the Natural Gas Pipeline Safety Act of 1968, or the Hazardous Liquid Pipeline Safety Act of 1979, or which is an intrastate pipeline facility regulated under State laws;
5. surface impoundments, pits, ponds, or lagoons;
6. storm water or waste water collection systems;
7. flow-through process tanks;
8. liquid traps or associated gathering lines directly related to oil or gas production and gathering operations;
9. storage tanks situated in an underground area (such as a basement, cellar, mineworking, drift, shaft, or tunnel) if the storage tank is situated upon or above the surface of the floor.

What Substances Are Covered? The notification requirements apply to underground storage tanks that contain regulated substances. This includes any substance defined as hazardous in section 101 (14) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), with the exception of those substances regulated as hazardous waste under Subtitle C of RCRA. It also includes petroleum, e.g., crude oil or any fraction thereof which is liquid at standard conditions of temperature and pressure (60 degrees Fahrenheit and 14.7 pounds per square inch absolute).

Where To Notify? Completed notification forms should be sent to the address given at the top of this page.

When To Notify? 1. Owners of underground storage tanks in use or that have been taken out of operation after January 1, 1974, but still in the ground, must notify by May 8, 1986. 2. Owners who bring underground storage tanks into use after May 8, 1986, must notify within 30 days of bringing the tanks into use.

Penalties: Any owner who knowingly fails to notify or submits false information shall be subject to a civil penalty not to exceed \$10,000 for each tank for which notification is not given or for which false information is submitted.

INSTRUCTIONS

Please type or print in ink all items except "signature" in Section V. This form must be completed for each location containing underground storage tanks. If more than 5 tanks are owned at this location, photocopy the reverse side, and staple continuation sheets to this form.

Indicate number of continuation sheets attached

1 *

I. OWNERSHIP OF TANK(S)

Owner Name (Corporation, Individual, Public Agency, or Other Entity)

El Paso Natural Gas Company

Street Address

P. O. Box 1492

County

El Paso

City

El Paso

State

Texas

ZIP Code

79978

Area Code

915

Phone Number

541-2879

Type of Owner (Mark all that apply)

Current

State or Local Gov't

Private or Corporate

Former

Federal Gov't (GSA facility I.D. no. _____)

Ownership uncertain

II. LOCATION OF TANK(S)

(If same as Section I, mark box here)

Facility Name or Company Site Identifier, as applicable

Eunice

Street Address or State Road, as applicable

P. O. Box 127

County

Lea

City (nearest)

Oil Center

State

NM

ZIP Code

88266

Indicate number of tanks at this location

4

Mark box here if tank(s) are located on land within an Indian reservation or on other Indian trust lands

III. CONTACT PERSON AT TANK LOCATION

Name (If same as Section I, mark box here)

Job Title

Area Code

Phone Number

IV. TYPE OF NOTIFICATION

Mark box here only if this is an amended or subsequent notification for this location.

V. CERTIFICATION (Read and sign after completing Section VI.)

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

Name and official title of owner or owner's authorized representative

John C. Bridges

Signature

John C. Bridges

Date Signed

5/13/86

CONTINUE ON REVERSE SIDE

Eunice

*Disclaimer

The tank for which this registration is made is excluded from the registration requirement because it is a pipeline facility regulated under the Natural Gas Pipeline Safety Act of 1968. El Paso Natural Gas Company is providing this form to DOT as a courtesy with copies to the appropriate state agency.



STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

TONY ANAYA
GOVERNOR

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

March 4, 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

El Paso Natural Gas Co.
One Petroleum Center/Building Two
3300 North "A" Street
Midland, Texas 79707

Attention: Mr. J. W. Cunningham

Re: EPNG Discharge Plans -
Lea County Plants Drain
Line Testing

Dear Mr. Cunningham:

We have reviewed the results of the drain line testing program which was conducted by EPNG as part of the discharge plan for the Jal No. 3 (GWR-10), Jal No. 4 (GWR-7), Eunice (GWR-9), and Monument (GWR-8) gas processing plants.

Upon analysis of the results and an estimation of the corrosion rates, we concur with your suggestion that yearly testing of the drain systems would be excessive. Therefore, by this letter, hydrostatic testing of the underground drain systems for the Jal No. 3, Jal No. 4, Eunice, and Monument gas processing plants will be required as part of the discharge plan renewal process. The testing program for each plant should be completed prior to the submittal of the discharge plan renewal. The discharge plan renewal shall include drawings of, and procedures for, the testing program as well as the results obtained from the testing program. A list of all piping replaced should also be included.

It should be noted that in the future, all gas processing plants and oil refineries in excess of twenty-five years of age will be required to submit plans for, or the results of, an underground drainage testing program as a requirement for discharge plan approval or renewal.

If you have any questions concerning this letter and the effect it may have on other EPNG plants, please feel free to call Phil Baca or Dave Boyer at (505) 827-5812.

Sincerely,

A handwritten signature in cursive script, appearing to read "R. L. Stamets".

R. L. STAMETS
Director

RLS/PB/dp

cc: William F. Lorang, EPNG
OCD-Hobbs Office

P 505 905 861

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED—
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to El Paso Natural Gas	
Street and No. 3300 N. "A" St.	
P.O., State and ZIP Code Midland, Texas 79707	
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

February 25, 1985

Mr. Philip L. Baca
Environmental Engineer
Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87501

Dear Mr. Baca:

Per our telephone conversation of this date, enclosed are copies of our Jal No. 3 and Jal No. 4 Plant drain system drawings. I have placed a check mark by the lines that were replaced or repaired.

Items b, c, d and e, as noted in O. R. Dakan's memorandum to J. W. Cunningham dated February 15, 1985, for Jal No. 3 Plant were installed in 1950. Items a and f were installed in 1959.

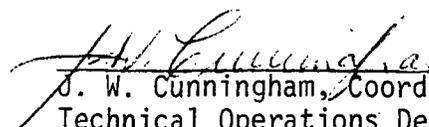
Items a and b for Jal No. 4 Plant were installed in 1952.

Hopefully, this information, along with the information supplied to you last week, will enable OCD to relax the annual drain line testing requirements of our Discharge Plans and also enable you to develop testing intervals that are realistic and can be justified by companies in our industry.

If additional information is needed, please let me know.

Sincerely,

EL PASO NATURAL GAS COMPANY


J. W. Cunningham, Coordinator
Technical Operations Department

JWC:gfc

Enclosures

Plant Age: 34 yrs

Pipe Size	Sch. 40	Sch. 10	Assumed	Sch. 40	Sch. 10
	Wall Thick.	Wall Thick	C-Rate	C-Rate	C-Rate
3"	.216"	.120"	.02"/yr 	.006"/yr	.003"/yr
4"	.237"	.120"		.007"/yr	.003"/yr
6"	.280"	.130"		.008"/yr	.004"/yr
8"	.322"	.148"		.009"/yr	.004"/yr
10"	.365"	.165"		.011"/yr	.005"/yr
				$\bar{x} = .008"/yr$	$\bar{x} = .004"/yr$

Assume Corrosion Rate of .02 in/yr

Pipe Size	Sch. 40	Sch. 10	Life	Life
	Wall Thick	Wall Thick	Sch. 40	Sch. 10
3"	.216"	.120"	11 yr	6 yr
4"	.237"	.120"	12 yr	6 yr
6"	.280"	.130"	14 yr	7 yr
8"	.322"	.148"	16 yr	7.4 yr
10"	.365"	.165"	18 yr	8.3 yr
			$\bar{x} = 14.2 yr$	$\bar{x} = 6.9 yr$

Assume Corrosion Rate of .01 in/yr

Pipe Size	Life	Life	
	Sch. 40	Sch. 10	
3"	22 yr	12 yr	
4"	24 yr	12 yr	
6"	28 yr	14 yr	
8"	32 yr	15 yr	
10"	36 yr	16 yr	
		$\bar{x} = 28.4 yr$	$\bar{x} = 13.8 yr$

∴ Choose a 25 yr. life for pipes. Start inspecting when plants reach 25 yrs.

PIPE REPLACED BY EPNG

JAL #4

180'	of	4"	Pipe	32 yrs.	Old
110'	of	8"	Pipe	32 yrs.	Old
75'	of	10"	Pipe	32 yrs.	Old

JAL #3

40'	of	3"	Pipe	25 yrs	Old (High Temp)
70'	of	3"	Pipe	32 yrs	Old
10'	of	6"	Pipe	32 yrs	Old
25'	of	4"	Pipe	32 yrs	Old
9'	of	6"	Pipe	32 yrs	Old

February 19, 1985

New Mexico Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87501

Attention: Mr. R. L. Stamets, Director

**RE: EPNG DISCHARGE PLANS - LEA COUNTY PLANTS
DRAIN LINE TESTING**

Gentlemen:

This letter is to advise that El Paso Natural Gas Company has just recently completed the hydrostatic drain line testing of our Lea County Plants for the year 1984. This testing was done pursuant to our approved Discharge Plans for Eunice, Jal No. 3, Jal No. 4 and Monument. Drain lines in the Jal No. 1 Plant were not tested because the plant is currently shut down. There are no plans at the present time to reactivate the plant.

Attached for your information and to be considered as part of this report are two (2) memorandums from Mr. O. R. Dakan to J. W. Cunningham detailing the results of the tests, repairs or actions taken and cost information associated with the tests.

As you will note all lines not meeting the test requirements were either repaired, replaced, or taken out of service except for line No. TDL-15"-L1, which is a clay tile line running beneath the Jal No. 3 gasoline plant concrete drain aprons and a 4" low pressure drain line running beneath the concrete drain apron in the treating plant at Jal No. 3. It would be extremely expensive to repair or replace these lines.

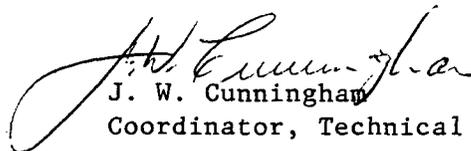
Because of the extraordinary time and expense involved in annual testing of the drain lines and because of the remote possibility of ground water contamination from leaking drain lines, El Paso Natural Gas Company respectfully requests that the annual drain line testing provision of the Discharge Plans be rescinded or at least be extended to no more than once every five years. Also, as support for our request to rescind this provision is the fact that we have been advised by Phillips Petroleum Company and Northern Natural Gas Company, who also operate plants in the Lea County Area that they do not have these requirements in their approved Discharge Plans.

Page 2
February 19, 1985

If there are any questions regarding the test results or our request to rescind the test requirements, please advise the undersigned at your earliest convenience.

Sincerely,

EL PASO NATURAL GAS COMPANY

A handwritten signature in cursive script, appearing to read "J. W. Cunningham".

J. W. Cunningham
Coordinator, Technical Operations

JWC:dc

TO: J. W. Cunningham

DATE: February 15, 1985

FROM: O. R. Dakan

PLACE: Permian Division-Midland

RE: RESULTS OF DRAINLINE TESTING AT SOUTHEASTERN NEW MEXICO PLANTS

After checking available drawing information, it has been determined that the underground portion of the drain systems are as follows:

<u>PLANT</u>	<u>LENGTH OF DRAIN LINES, ALL SIZES</u>
Jal #4	33,045 ft.
Jal #3	26,115 ft.
Eunice	15,535 ft.
Monument	4,665 ft.

Currently, the status of the above drain systems is as follows:

- I. Jal No. 4 Plant-Lines which would not hold test pressure were:
- Installed 1952* {
- a) 4" low pressure drain from reflux accumulator to 16" drain header (line has been rerouted and replaced).
 - b) 10"/8" boiler and evaporator blowdown header (line has been replaced).
- II. Jal No. 3 Plant-Lines which would not hold test pressure were:
- 1950* {
- a) Line: ODL-6"-L3 Leaks in 3" drains from intercoolers were repaired. Line in service. *(1959)*
 - b) Line: ODL-3"-L17 Op drain from the reflux accumulator. This steel line (70') is being replaced with PVC line.
 - c) Line: 6" L.P. from hot wells to line ODL-8"-L10-10' section replaced and line retested.
 - d) Line: 4" L.P. drain from Solution exchangers to Line ODL-8"-L12 leaking under concrete apron. No repairs have been made.
 - e) Line: 6" L.P. drain to solution sump - 9' Section replaced and line retested.
 - f) *1959* Line: TDL-15"-L1 Open Apron and storm water drain. This tile line would not pressure because of joint design (Mortar joints) and inability to get a tight seal with the expandable plugs. This drain handles liquids from the Aprons during bundle cleaning operations, steam condensate from the heat tracing line steam traps, and rain water. The discharge end of the line empties into an open distribution sump and has no pressure in the line during normal operations. Under these conditions any leakage at the joints will be minimal since the liquid will take the path of least resistance (i.e. the open end of the line). The line is located under all the concrete aprons North of the Gasoline Pump house and would be extremely expensive to replace. Considering the types of fluids that this

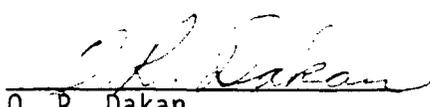
line transports and the cost of replacement, unless ordered otherwise, this line will be left as is.

At Eunice Plant, the lines which would not hold test pressures were:

- a) Line: 6" from water treating building to 8" open drain header. A short section of this line has apparently been subjected to corrosion in a "Hot Spot" where cathodic protection was interrupted. This condition is to be corrected and the clamped section of line replaced. Fluid is water treater backwash water.
- b) Line: 4" Drain from Mainline inlet scrubber area to 8" open drain header (Taps F43 and F28). This drain was found to be inactive and was permanently isolated at the 4" to 8" junction. Line is now inactive.

At Monument Plant, there were no leaks on the drain lines. All lines shown on Drainline drawing are in service.

Other than those lines, or sections, previously mentioned, all drain lines in these systems tested leak-free. Pressure charts are on file at the plant for verification of pressures and durations in accordance with the respective drain line test procedures previously published.


O. R. Dakan

ORD:cd

cc: L. E. Anderson
Harold Franklin
Bill Lorang
Charlie Mathis
G. T. Thurman
P. E. Wieland
File - 2

TO: J. W. CUNNINGHAM

DATE: FEBRUARY 7, 1985

FROM: O. R. DAKAN

PLACE: PERMIAN DIVISION-MIDLAND

RE: 1984 DRAINLINE TESTING COSTS

Listed below are the actual costs of Pressure Testing the drainlines at the southeastern New Mexico plants.

Morument

EPNG Labor	(402)	\$2052.07
EPNG Equipment	(420)	1333.37
Material & Parts	(417)	530.19
Contractor Charges	(429)	5279.00
Total		<u>\$9194.63</u>

Eunice

EPNG Labor	(402)	\$3743.67
EPNG Equipment	(420)	1610.25
Materials & Supplies	(417)	1118.15
Contractors Charges	(429)	6375.96
Total		<u>\$12,848.03</u>

Jal No. 3

EPNG Labor	(402)	\$4646.74
EPNG Equipment	(420)	1530.15
Materials & Supplies	(417)	3948.18
Contractor Charges	(429)	7414.60
Total		<u>\$17,539.67</u>

Jal No. 4

EPNG Labor	(402)	\$10354.93
EPNG Equipment	(420)	3741.80
Materials & Supplies	(417)	6097.82
Contractors Charges	(429)	6097.82
Total		<u>\$26,292.37</u>

Total direct cost - 4 Plants - \$65,874.70

After discussions with Hardy Cook and personnel at the respective plants, it has been estimated that approximately \$5000 additional EPNG labor and equipment charges were spent as indirect or unlabeled expenses. Plant personnel were involved in location of lines, valves and drains at various times during the testing procedure.

It is recommended that the Oil Conservation Division (OCD) be petitioned to extend the testing interval to 5 years instead of the present annual schedule. Although the next test will not be as expensive as this initial test, an annual outlay of approximately \$40,000 to \$50,000 for drain line testing is not warranted. Testing on a 5 year basis would serve the same purpose at a reduced average annual cost.



O. R. Dakan
O. R. Dakan
Chief Division Project Engineer

ORD:jlr

cc: L. E. Anderson
Harold Franklin
Bill Lorang
Charlie Mathis
G. T. Thurman
P. E. Wieland
File - 2



STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

ONEY ANAYA
GOVERNOR

October 11, 1983

POST OFFICE BOX 2086
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-5800

El Paso Natural Gas Company
Box 1492
El Paso, Texas 79978

Attention: Mr. B. J. Mathews

Re: GWR-9
Discharge Plan

Gentlemen:

The discharge plan submitted pursuant to the Water Quality Control Commission Regulations for the controlled discharge of waste water and associated fluids from the Eunice Plant located in Section 5, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico, is hereby approved.

The discharge plan was submitted pursuant to Section 3-106 and is approved pursuant to Section 3-109 of the Water Quality Control Commission Regulations. The plan is approved on October 11, 1983, and is in effect for five years.

Yours very truly,

JOE D. RAMEY
Director

JDR/fd

El Paso Natural Gas Co.
Emil Plant GWR-9

P1

- 1 Status
- 1 4-29-80 OCD requested a discharge plan
- 2 6-2-80 El Paso requested a 6 mo extension
- 3 6-10-80 OCD granted a 6 mo extension
- 4 10-30-80 El Paso submitted progress report
- 5 1-12-81 El Paso requested a 90 day extension
- 6 1-16-81 OCD granted a 90 day extension
- 7 3-24-81 El Paso requested a 6 mo extension
- 8 4-9-81 OCD granted a 6 mo extension
- 9 4-9-81 El Paso progress report + explanation on extension
- 10 10-9-81 El Paso requested a 6 mo extension
- 11 10-27-81 OCD inspect plant
- 12 10-27-81 OCD requested El Paso to submit proof
for 6 Month extension
- 12A 10-28-81 OCD-EPNG Telephone conversation
- 13 10-28-81 OCD granted 6 mo extension to
11-21-81
- 14 12-81 OCD gave verbal extension to 1-82
- 15 1-11-82 El Paso submitted their discharge plan
- 16 2 - 82 OCD review of Discharge Plan

El Paso Natural Gas Co.
Eunice Plant GWR-9

P2

- 17 7-1-82 EPNG submitted progress report for construction of collection + injection system
- 18 8-6-82 EPNG progress report
- 19 1-20-83 OCD - EPNG telephone conversation - discuss possible sludge disposal
- 20 2-7-83 EPNG cover letter submitting 2nd draft of ^{Eunice} ~~manurement~~ discharge plan.
- 21 2-8-83 - EPNG submitted 2nd draft of Eunice discharge plan
- OCD EPNG meeting - discuss discharge plan verbal
- 22 2-28-83 EPNG letter answering verbal comments at meeting of 2-28-83
- 23 3-11-83 - OCD draft of technical comments submitted to Joe Romig.
- 24 3-14-83 - Received OCD technical comments supplied to EPNG on 3-15-83
- 25 3-18-83 - EPNG reply to ^{OCD} comments of 3-14-83
- 26 4-8-83 - OCD - EPNG meeting presented data + sampling protocol for effluent

EPNG
Eunice Plant GWR-9

P3



missing information

27

OCD advertized EPNG Eunice Discharge
Plan

28

10-11-83

OCD approved EPNG discharge plan
for Eunice Plant



STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

TONEY ANAYA
GOVERNOR

October 11, 1983

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

El Paso Natural Gas Company
Box 1492
El Paso, Texas 79978

Attention: Mr. B. J. Mathews

Re: GWR-9
Discharge Plan

Gentlemen:

The discharge plan submitted pursuant to the Water Quality Control Commission Regulations for the controlled discharge of waste water and associated fluids from the Eunice Plant located in Section 5, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico, is hereby approved.

The discharge plan was submitted pursuant to Section 3-106 and is approved pursuant to Section 3-109 of the Water Quality Control Commission Regulations. The plan is approved on October 11, 1983, and is in effect for five years.

Yours very truly,

JOE D. RAMEY
Director

JDR/fd

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

Notice is hereby given that pursuant to New Mexico Water Quality Control Commission Regulations, the following proposed discharge plan has been submitted for approval to the Director of the Oil Conservation Division, P. O. Box 2088, State Land Office Building, Santa Fe, New Mexico 87501, telephone (505) 827-5803.

EL PASO NATURAL GAS COMPANY, Eunice Plant (Section 5, Township 21 South, Range 36 East, NMPM, Lea County, New Mexico) P. O. Box 1384, Jal, New Mexico 88252, also P. O. Box 1492, El Paso, Texas 79978, telephone (915) 541-3292, proposes to discharge approximately 1280 barrels of waste water per day. The waste water is derived from plant process, boiler and cooling tower water, and domestic effluent. The waste water will be disposed of into an injection system operated by Rice Engineering Operating, Inc. and ultimately into an injection well(s). The total dissolved solids content of the waste water is approximately 1250 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 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.

Notice Dates:
8/29/83 (ALB)
8/31/83 (HOBBS)

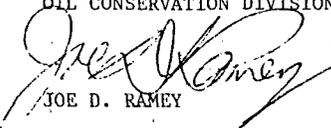
GIVEN Under the Seal of
the New Mexico Oil Con-
servation Commission at
Santa Fe, New Mexico, on
this 24th day of August, 1983.
STATE OF
NEW MEXICO
OIL CONSERVATION
DIVISION
JOE D. RAMEY
Director
(SEAL)

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 24th day of August, 1983.

STATE OF NEW MEXICO

OIL CONSERVATION DIVISION



JOE D. RAMEY

Director

S E A L

GIVEN Under the Seal of
the New Mexico Oil Con-
servation Commission at
Santa Fe, New Mexico, on
this 24th day of August, 1983.
STATE OF
NEW MEXICO
OIL CONSERVATION
DIVISION
JOE D. RAMEY
Director
(SEAL)



El Paso
Natural Gas Company

OIL CONSERVATION DIVISION

AUG 25 1983

RECEIVED

P. O. BOX 1492
EL PASO, TEXAS 79978
PHONE: 915-543-2600

BILLY J. MATTHEWS VICE PRESIDENT

August 23, 1983

Mr. Joe Ramey, Director
New Mexico Oil Conservation Division
P. O. Box 2088
Santa Fe, NM 87501

Re: The Enclosed Discharge Plan for
El Paso Natural Gas Company's
Eunice Plant

Dear Mr. Ramey:

Please find enclosed the complete discharge plan for El Paso's Eunice Plant.

El Paso has set forth therein in detail the methods and techniques proposed to be used which will ensure compliance with the New Mexico Water Quality Act and the New Mexico Water Quality Control Commission regulations.

El Paso hereby requests that you act on the proposed plan pursuant to Sections 3-108 and 3-109 of the regulations.

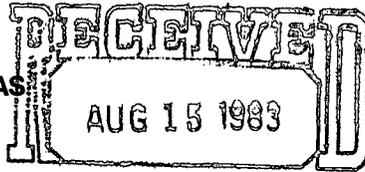
Thank you for your consideration of this matter.

Very truly yours,

B. J. Matthews



El Paso NATURAL GAS COMPANY



Memorandum

OIL CONSERVATION DIVISION
SANTA FE

TO: Oscar Simpson

DATE: August 10, 1983

FROM: Permian Division-Plant Operations

PLACE: Jal, N.M.

RE: EUNICE WASTE WATER DISCHARGE TO RICE ENGINEERING

DATE	DISPOSED WATER BARRELS	CUMULATIVE DISPOSED WATER BARRELS	AVERAGE INJECTION PRESSURE
July, 1983	81,260	401,000	1 lb.

H.C. Franklin
H. C. Franklin *JB*



RECEIVED
JUL 15 1983
OIL CONSERVATION DIVISION
SANTA FE

MEMORANDUM

TO: Oscar Simpson DATE: July 12, 1983
FROM: Permian Division-Plant Operations PLACE: Jal, N.M.

RE: EUNICE WASTE WATER DISCHARGE TO RICE ENGINEERING

DATE	DISPOSED WATER BARRLES	CUMULATIVE DISPOSED WATER BARRELS	AVERAGE INJECTION PRESSURE
June, 1983	80,450	319,740	1 LB.

H. C. Franklin
H. C. Franklin *sw*



RECEIVED
JUN 13 1983
OIL CONSERVATION DIVISION
SANTA FE

MEMORANDUM

TO: Oscar Simpson

DATE: June 7, 1983

FROM: Permian Division Plant Operations

PLACE: Jal, N.M.

RE: Eunice Waste Water Discharge to Rice Engineering

DATE	DISPOSED WATER BARRELS	CUMULATIVE DISPOSED WATER-BARRELS	AVERAGE INJECTION PRESSURE
May, 1983	71,500	239,290	1 Lb.


H. C. Franklin

jb



RECEIVED
APR 18 1983
OIL CONSERVATION DIVISION
SANTA FE

MEMORANDUM

TO: Oscar Simpson

DATE: 4-13-83

FROM: Permian Plant Operations

PLACE: Jal, N.M.

RE: Eunice Waste Water Discharge to Rice Engineering

DATE	DISPOSED WATER BARRELS	CUMULATIVE DISPOSED WATER-BARRELS	AVERAGE INJECTION PRESSURE
Jan., 1983	41,400	41,400	35 lbs.
Feb., 1983	35,060	76,460	1 lbs.
March, 1983	38,800	115,260	1 lb.

H.C. Franklin
H. C. Franklin *sm*

MONTHLY WATER DISPOSAL REPORT

Submit this report in triplicate to the appropriate District Office, Oil Conservation Division

Disposal System Operator EL PASO NATURAL GAS CO. Disposal System Eunice Plant Discharge Plan
County LEA Month APRIL 19 83

LEASE	WELL NO.	LOCATION				DISPOSED WATER BARRELS	CUMULATIVE DISPOSED WATER-BARRELS	AVERAGE INJECTION PRESSURES
		UL	S	T	R			
Eunice Plant	Rice Eng.		5	21	36			
TOTAL						52,530	167,790	

I hereby certify that the above is true and complete to the best of my knowledge and belief.

Signature: W A Kemper Name W A Kemper
Company EL PASO NATURAL GAS CO.
Title PLANT SUPERINTENDENT

MONTHLY WATER DISPOSAL REPORT

Submit this report in triplicate to the appropriate District Office, Oil Conservation Division

Disposal System EL PASO NATURAL GAS CO. Disposal System EUNICE PLANT

County LEA Month MARCH 19 83

LEASE	WELL NO.	LOCATION				DISPOSED WATER BARRELS	CUMULATIVE DISPOSED WATER-BARRELS	AVERAGE INJECTION PRESSURES
		UL	S	T	R			
Eunice Plant	Rice Eng.		5	21	36			
TOTAL						38,800	115,260	1 lb.

I hereby certify that the above is true and complete to the best of my knowledge and belief.

Signature: W. B. K... Name

Company: EL PASO NATURAL GAS CO.

Title: PLANT SUPERINTENDENT

March 18, 1983

Mr. Joe Ramey
New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87501

Re: El Paso Natural Gas Company
Eunice and Monument Discharge Plan

Dear Mr. Ramey:

The following is to confirm the discussions during the meeting held in your office on March 15, 1983 and to respond more fully to the technical comments offered by Mr. Oscar Simpson. You called the meeting to discuss the draft addendum to the Eunice and Monument Discharge Plan which El Paso submitted on February 5, 1983. For clarity and brevity, the following numbered responses correspond to the specific numbered sections of the attached NMOCD comments:

1. The reasons for combining the original discharge plan into one report were the similarities of the plants and especially the method of disposal into the Rice Engineering system. The submitted draft addendum merely continued the original format. El Paso will separate the plans and assemble all relevant information in one rewritten plan initially. Subsequent submittals (discharge plans) will liberally reference this initial rewritten plan and depart from it only where location specific information dictates.
2. Because the cross-sections wouldn't add to the information already provided in the previous submittals, you made the decision that El Paso will not be required to submit additional North-South, East-West geologic cross-sections of the Ogallala.

3. This information was requested to identify possible points of withdrawal. El Paso offered that all the available information that could be obtained from the State Engineer's maps had been previously provided to OCD. In addition, such information served no purpose in the demonstration that groundwater degradation is prevented. Based on these and other arguments, El Paso will not be required to submit this information.
4. Although related to question No. 3, El Paso will name the immediately adjacent property user (surface user), if possible. No title search is intended, however.
5. El Paso will add statements to the plan text verifying that no joint use agreements exist or easements are granted on Plant property, and that El Paso owns all plant property.
6. Same as No. 5.
7. El Paso acknowledged that corrections are appropriate and will be made.
8. El Paso has already provided a verbal description of the soil types, with references. Xerox copies of the appropriate Soil Conservation Service maps will, however, be provided.
9. El Paso will add a statement that storm runoff can't enter the plants' collection systems. The physical realities preclude such a problem at these plants. Also, please see item number 21, below.
10. El Paso has already provided as much information as could be found on past operations with a photo history. Consequently El Paso does not have to submit the information requested in number 10.
11. El Paso is in the process of preparing closure plans for both locations. Closure plans cannot be submitted with the discharge plan until after the April 6 meeting alluded to later; however, El Paso will make a determination, and inform the OCD, when they will be submitted.
12. Following considerable discussion as to the reason for this request, a desire by OCD to know if something was being stored or is leaking in the shut-down equipment was identified. To this end El Paso will incorporate a statement that nothing is being stored or is leaking in shut-down equipment.

- ✓ 13. The ponds at Eunice and Monument are known to be drying; however, the exact status of the ponds could not be discussed. The important point was that nothing is being discharged to them now. Despite this, El Paso will incorporate a statement into the plan text indicating that El Paso will pump out any remaining fluids, and the remaining sludge will air dry by evaporation. In addition, a statement on the fate of rain-water in such ponds is expected, if practical.
14. Following a demonstration that standard engineering practices were used to estimate volumes of sewage, you indicated that El Paso will not have to submit any more information on the sewage than has already been given.
- ✓ 15 & 16. El Paso will provide a composite analysis protocol to meet Sec. 3-106 (C-1) of the Water Quality Control Commission (WQCC) Regulations. The protocol to be developed by the Environmental Affairs Department (EAD) will include a general discussion of the sampling and testing procedures, data, documentation, and records. The protocol will demonstrate that the composite analysis achieves a proportional-time weighted sampling, reflecting the fluctuating flow characteristics of the plant on a daily to yearly basis. The protocol is to be reviewed with the Agency on April 7, 1983 in Santa Fe. El Paso can develop a protocol which will comply with the regulations.
17. El Paso will provide evapotranspiration vs. infiltration data to show that WQCC standards will not be exceeded in ground water if classifier and tower sludges are placed in a dedicated pit on plant property. The data will be used to show that monitoring in the vados zone is not necessary (Sec. 3-107A 3). Discussions on this topic will be included with the composite analysis protocol on April 7, 1983 in Santa Fe. Part of the same demonstration of no leachate formation is tied to the organic chemical analysis and disposal methods for Jal No. 4 which will also be discussed April 7.
18. El Paso will again verify that, utilizing the referenced methods, hazardous waste is not generated. This methodology was utilized previously. In all probability, a statement will be added to the plan indicating that appropriate hazardous waste analyses will be performed on the classifier and tower sludges to verify non-hazardous characteristics. Considerable time and expense is involved if all wastes must be evaluated accordingly.

19. This item is related to Item 18. Since this meeting, El Paso's EAD has requested and obtained a legal determination from company lawyers that the oil and gas industry is indeed exempt from the RCRA law. In addition, the mixture rule has been reviewed and within certain guidelines, El Paso can implement collection (retention) systems to capture and re-use closed cooling systems containing chromium over 5 ppm, which will constitute legitimate re-use and recycling. Such use is exempt from the hazardous waste regulations. El Paso would welcome the opportunity to review the EPA and New Mexico Hazardous Waste Regulations with you, so that you may satisfy yourself that El Paso's interpretations are correct.

El Paso also respectfully requests that the jurisdiction of the NMOCD over the plants under discussion be reaffirmed by the Water Quality Control Commission.

20. Because this information has already been submitted, no further information is required by the OCD.
21. El Paso will incorporate a statement into the discharge plan text indicating that no flooding potential exists for the collection and drainage system and no open drains are tied into the classifier system.
22. El Paso will incorporate a statement into the discharge plan text indicating that cleaning and disposal of debris and sludge from the collection system will be on an "as-needed" basis, because the system has not been in operation long enough with regular flows to establish a schedule.
23. El Paso's response to this request is contingent on OCD approval of disposal in a dedicated pit on plant property.
24. El Paso will incorporate a statement into the discharge plan text showing that products are not discharged. A brief summary of product types and handling methods will be included.
25. El Paso will indicate that drainlines will be hydrotested on a yearly basis. Verbal agreement was given by you that it is more appropriate, and not a part of this discharge plan, to obtain a separate permit for any hydrostatic testing. If disposal of the hydrotest water would happen to involve the plant effluent disposal system, then OCD would be notified consistent with the WQCC regulations.
26. Similiar to question No. 18, El Paso will again verify that hazardous waste activity is not being conducted.
27. This will be covered in the sampling protocol to be supplied by El Paso and reviewed with OCD on April 7, 1983. The point of sampling will be put on one of the many previously submitted drawings.

28. Section 3 - 107A (1) is addressed in the draft addendum. Section 3-107A (2 through 10) will not be necessary contingent on the April 7 meeting. However, pursuant to 3-107A (7) El Paso will incorporate a statement into the discharge plan text indicating that all records will be retained for 5 years.

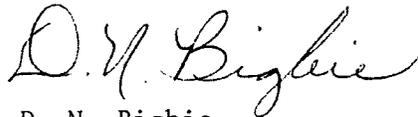
Pursuant to 3-107A (11) El Paso will add a statement that upon abandonment of facilities all discharges shall cease.

29. The only appropriate response is to reference the wording in the contract between Rice and El Paso.
30. El Paso will not have to submit such a map.
31. If a successful demonstration of the integrity of all gravity flow drains can be made, showing that it is very unlikely that big leaks will develop between yearly tests, this request will be deleted.
32. The testing plans are already referenced in the discharge plan. These plans will be submitted when completed.
33. This request is similiar to Item 24 and El Paso will not have to submit such a plan.
34. This information has already been submitted.
35. The discussions of the various protocols on April 7 will determine the appropriateness of the requests and responses. El Paso does not believe the recommended monitoring wells would provide useful information.
36. Since the EID well is PVC cased, the request is dropped.
37. This request is also part of the protocols to be discussed.
38. The missing figures were located.
39. El Paso will supply engineering specifications on the meters. The location has already been provided.

In summary, El Paso feels that these specific responses and general comments clarify all the remaining questions that must be addressed on the captioned discharged plan. El Paso fully expects to address all the remaining unanswered questions during our upcoming meeting on April 7, 1983. The primary objective of the submittal of discharge plans is to make the demonstrations that degradation of groundwater is prevented. During the nearly three years that have passed since the first request for a discharge plan for Eunice Plant (April 29, 1980), El Paso has spent over \$5,000,000 on wastewater collection systems in Lea County, New Mexico. The systems meet the standards of performance consistent

with technical practicability and economic reasonableness required by the New Mexico Oil Conservation Division as a constituent member of the Water Quality Control Commission. The wastewater systems now installed and working at Eunice and Monument Plants are designed exactly like the one at El Paso's Jal No. 4 Plant which was approved by the OCD from construction drawings prior to the construction of the disposal system. El Paso now wishes the approval process of the captioned discharge plan to catch up with the realities that exist at both locations; namely, expensive and effective wastewater collection systems are installed and operating properly at both locations. El Paso believes that the operating systems meet the requirements and objectives of the New Mexico Clean Water Act ["to prevent or abate water pollution"], and respectfully requests the New Mexico Oil Conservation Division's early approval of the plans.

Very truly yours,



D. N. Bigbie
Assistant Division Superintendent

DNB/mts



STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

TONEY ANAYA
GOVERNOR

March 14, 1983

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

El Paso Natural Gas Company
Two Petroleum Center/ Suite 200
North "A" at Wadley
Midland, Texas 79701

Attention: D. N. Bigbee

Re: OCD Review of Eunice
and Monument Discharge
Plan Drafts

Dear Sir:

Pursuant to the submittal of the draft of the Eunice and Monument discharge plans on February 8, 1983, attached are the Oil Conservation Division's technical comments.

If you have any questions concerning this matter, please call me at (505) 827-5822.

Sincerely,

A handwritten signature in cursive script that reads "Oscar A. Simpson III".

OSCAR A. SIMPSON, III
Water Resource Specialist

OAS/dp

Enc.

1 It would be greatly appreciated if the Eunice and Monument discharge plans were separated into independent reports. Also please assimilate into the reports in a coherent manner any information and data that may be forthcoming as the result of the following comments on your Eunice and Monument discharge plans.

III. DESCRIPTION OF THE ENVIRONMENT (pp. 4 to 10)

2 A. Submit a detailed N-S and E-W geologic cross-section of the Ogallala formation for both Eunice and Monument. Show the water table and the control points. The cross-sections should extend 1/2 mile beyond the property boundaries in all directions.

B. Show on a map of appropriate scale, all land use within one mile of each plant.

- 1) Industrial
- 2) Commercial
- 3) Residential
- 4) Irrigated Land
- 5) Recreational
- 6) State and Federal Lands
- 7) Unused Land
- 8) Abandoned and Present Water Wells
- 9) Wells Proposed to be Monitored
- 10) Pipelines
- 11) Location of Geologic Cross Sections

3 C. On figures 5A and B or a revision thereof:

- 4
- 1) Show ownership of adjacent property to EPNG's Eunice and Monument properties (Names and Mailing addresses)

- 5 2) Show all right-of-ways and easements on
plant properties and ownership thereof.
- 6 3) Show and name any parent companies lying
within plant properties. Show facilities
owned.

IV. SURFACE HYDROLOGY (pp. 11-17)

7 A. Correlate Appendix A and B which have number
systems to Tables 5 and 6 and Figures 5A and B which have
letter systems as to drainage areas. (Eunice Plant)

8 B. Submit a map showing the distribution of the
soil types for each plant. Show soil sample locations.

9 C. Describe what effect storm runoff will have on
each plant's collection and drainage system. At what point
(volume) will storm runoff cause overflow and flooding of the
collection and drainage systems for each plant? Are there
any storm drain systems? Derive calculations for each
drainage area (figures 5A and B) that will predict the extent
storm runoff will be degraded due to flooding of the
collection and drainage systems. Submit a contingency plan
or corrective plan of action that will resolve this problem.

D. Submit a more detailed history of past
operations concerning waste disposal areas and ponds that
include: (For Eunice and Monument Plants)

- 10 1) Date built?
- 2) Used for what length of time?
- 3) Volume and type of waste disposal
including chemicals (chemical
constituents-theoretical or analytical)
- 4) From what processes were they from?
- 5) Show on a map or aerial photo the
sequence of events and locations
thereof.

11 E. Submit a detailed closure plan (both plants)
for past and present waste disposal areas and ponds.

DICHARGE PLANS - EUNICE AND MONUMENT

12 A. Submit a description of the whole existing plant (this includes that portion which is shut down and not presently operating). When was section or process shut down? Were all facilities properly shut down so that discharges or potential discharges of wastes, products, or chemicals cannot occur. If not, how and when will the problem be abated?

13 B. Show present status of existing ponds as to whether they are dry, being drained, and if applicable, anticipated date when ponds will be drained. How are ponds being drained? Drainage by evaporation will not be allowed.

14 C. Is all sewage being disposed of through Rice Engineering System? If not, where and how? Describe how volumes of sewage were determined. Show measuring point. Show the location of the chlorination station. What mechanism or apparatus is chlorinating the sewage effluent? Define the flow characteristics of the sewage. Describe the flow measurement apparatus in detail. Define the quality of the sewage as per Section 3-103 A, B and C.

15 Under Section 3-106 (C-1) of the WQCC Regulations 82-1, the quantity, quality, and flow characteristics of the discharge are required to be defined. The information in the discharge plans has no supporting data to verify the statements made in the report. A complete analysis of the plant effluent was not submitted as required by 3-103 (A, B and C). Organic substances were not addressed. Methods and locations of flow measurement were not defined or described. Flow characteristics of the sources of waste water were not addressed. Flow characteristics reflect or represent plant fluctuations, seasonal variations, and maintenance and repair of a plant. These fluctuations reflect quality and quantity in a plant effluent. Data, documentation, and records of sampling and testing were not submitted.

16 Under Sections 3-104 and 3-106 (C-1) WQCC regulations 82-1 EPNG is required to define the quantity, quality, and flow characteristics of any discharge (s) whether in the form of a effluent or leachate. Therefore each source point of the discharge whether separatic or constant in nature will be characterized as to its quantity, quality, and flow characteristics. The quality of each discharge shall be characterized for those constituents as

listed in Section 3-103 (A, B, and C). The quantity shall be measured by standard engineering practices such as those described in the "Handbook for Monitoring Industrial Wastewater, August 1973, PB-259 146". Refer to chapters 3, 6, and 7 for guidance. The flow characteristics reflect daily to yearly plant fluctuations which in turn reflect changes in quality and quantity.

16
CONT'D

The flow characteristics should be used to statistically define the quantity and quality of the effluent and or lechate. EPNG is requested to statistically characterize their effluent and or leachate by the flow proportional-time weighted composite sampling technique as described in the "Handbook for Monitoring Industrial Watsewater". This is the only method that represents the intent and requirements of Section 3-106 (C-1) of the WQCC regulations.

Submit all documents, records, and data necessary to achieve the flow proportional-time weighted sampling.

- 1) Submit graphs or illustrations which illustrate your results
- 2) Show calculations
- 3) Show measuring and sampling points on figure 5A and on the flow schematic

In reply to EPNG's letter of January 31, 1983, from O. R. Dakan and the Eunice and Monument Discharge Plans, the OCD would like to clarify the difference between New Mexico WQCC regulations and the EPA's (RCRA) Hazardous Waste Regulations:

- 17
- 1) The WQCC regulations have lower standards than RCRA.
 - 2) If a substance is leachable and that leachate will violate WQCC standards, then disposal of that substance or leachate must be disposed of in such a manner that ground water cannot be effected.
- 18
- 3) The Rice Engineering injection system or wells are considered to be Class II Wells. Disposal of substances up to the limit of the RCRA standards can be disposed of in a Class II well without changing the

classification, and the monitoring and mechanical integrity requirements of the well.

- 4) Liquids, sludges, solids and any leachate thereof that are above the standards of the WQCC regulations cannot be disposed of in unlined pits where ground water has the potential to be effected. The RCRA standards do not supersede the WQCC standards in this case and cannot be applied to this case.
- 5) RCRA Hazardous Waste - land disposal - has a system of monitor wells on and around the disposal area. If any leachate from the hazardous material is detected in any quantity, then the disposal system must be modified, corrected or discontinued and removed.

EPNG is requested to submit a detailed procedural outline that will set forth the methodology of sampling, testing, evaluating and prescribing modes of disposal for all sludge in every plant. All sources or areas that generate sludge in a plant must be identified as to quality, quantity, and flow characteristics. If a data base line of analysis is sufficient to show that future testing is not required, then the testing requirements will be dropped.

Those constituents as listed in Section 3-103 (A,B, and C) are the parameters which the sludges and associated waste will be analyzed for.

The test methods to be used are:

- 1) The extraction procedure - Appendix II of 40 CFR, Part 261 (RCRA) Section 7 - for metals
- 2) EPA leachate extraction method (for organics) - 40-CFR, Part 261
- 3) EP Toxicity Test - 40 -CFR-261

The OCD will request that EPNG designate a specific disposal area for disposal of all on site wastes which cannot be disposed of by injection and in conjunction pose a threat to ground water.

The OCD requests that all leachable substances and fluids that cannot be disposed of by injection be placed in a double-lined disposal pit with a leak detection system

18
CONT'D

between the liners. Pit plans and specifications must be approved prior to construction. Other disposal methods may be substituted upon approval.

The hazardous waste section in Dallas, Texas and the EID section concur that:

- 1) The oil and gas industry does not have exempt status once production begins from the wellhead.
- 2) The following is considered to be potential hazardous waste sources and generators of hazardous waste if they meet certain criteria:
 - a) Wastewater classifiers (sludge)
 - b) Closed cooling systems containing chromate over 5ppm
 - c) Carbon filter materials
 - d) Cooling towers greater than 5 ppm CR
 - e) DGA bottoms
 - f) Tank bottoms
 - g) Any non-hazardous material that is mixed with a hazardous substance automatically becomes a hazardous substance itself.

19

20

Submit a detailed description of the types of collection systems used to collect the various sources of plant effluent.

Submit detailed plans which illustrate and describe the various types of collection and drainage systems.

21

Submit calculations to verify the flow capability of the collection system.

22

What is the maintenance schedule for cleaning debris and sludge from the collection system?

23

Where and how is the sludge from the collection system to be disposed of?

24 Describe what products are produced from the raw gas and what is the disposition of these substances and how are they stored and transferred. (Define the chemical composition of the raw and refined products.)

25 Address hydrostatic testing and discharge of hydrostatic test water sources, include major transmission lines coming in and out of the plants. Describe past disposal practices and what intended disposal practices will be implemented for the Eunice and Monument plants and appurtenances thereof.

26 Submit a list and description for all substances used or generated at each plant that include RCRA's - Listed Wastes and Characteristic Wastes.

27 Please address Section 3-106 (C-5)

28 The OCD requests that all of the requirements as set forth in Section 3-107 A (1-11) be addressed to the discharge plans of Eunice and Monument.

29 Submit a monitoring and inspection plan which is either administered by you or Rice Engineering and that assumes responsibility of the pipeline and contents thereof from EPNG's property to the injection system and wells.

30 Show on a map Rice Engineering injection systems that take effluent from Eunice and Monument plants.

MONITORING PLAN (pp. 24 and 46)

31 To further demonstrate that Eunice and Monument plants are collecting all effluent and wastes in an appropriate manner (not polluting) and are monitoring effluent; the OCD suggests that a mass balance accounting system of all incoming and outgoing materials in the effluent and wastes be performed on a frequency sufficient to monitor and account for mass in, out, and any losses thereof. (WQCC 82-1 - Section 3-106 (C-7) and 3-107-(A-1)

32 Submit the underground drain pipe pressure testing system in greater detail for both the Eunice and Monument plants.

33 Submit a Spill Prevention Control and Counter Measures Plan (SPCCP) as part of your contingency plan for both plants - Section 3-107 (a-10).

34 ADDRESS SECTION 3-106, (C-3) - WQCC 82-1

35 EPNG is requested to submit a plan that will encompass drilling of monitor wells up and down gradient of the Eunice plant property. Configuration and spacing of the wells in respect to the plant will be determined by hydrologic and geologic conditions of the Ogallala. The wells should be drilled to a depth of 75 feet below the ground water table or to the base of the red beds which ever is greater. The wells shall be of a minimum diameter of 2 inch I.D. and of stainless steel construction.

36 The EID monitor well should be resampled for those organic compounds as found in Section 3-103 (A) WQCC.

37 Submit data on EPNG Quality Assurance Programs for the labs that performed tests.

38 Figures - 12b and 13b are missing.

39 Describe the metering systems for the Eunice and Monument plants that meter effluent going to Rice Engineering.

Show locations on aerial photographs 5A and 5B.

March 18, 1983

Mr. Joe Ramey
New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87501

Re: El Paso Natural Gas Company
Eunice and Monument Discharge Plan

Dear Mr. Ramey:

The following is to confirm the discussions during the meeting held in your office on March 15, 1983 and to respond more fully to the technical comments offered by Mr. Oscar Simpson. You called the meeting to discuss the draft addendum to the Eunice and Monument Discharge Plan which El Paso submitted on February 5, 1983. For clarity and brevity, the following numbered responses correspond to the specific numbered sections of the attached NMOCD comments:

1. The reasons for combining the original discharge plan into one report were the similarities of the plants and especially the method of disposal into the Rice Engineering system. The submitted draft addendum merely continued the original format. El Paso will separate the plans and assemble all relevant information in one rewritten plan initially. Subsequent submittals (discharge plans) will liberally reference this initial rewritten plan and depart from it only where location specific information dictates.
2. Because the cross-sections wouldn't add to the information already provided in the previous submittals, you made the decision that El Paso will not be required to submit additional North-South, East-West geologic cross-sections of the Ogallala.

3. This information was requested to identify possible points of withdrawal. El Paso offered that all the available information that could be obtained from the State Engineer's maps had been previously provided to OCD. In addition, such information served no purpose in the demonstration that groundwater degradation is prevented. Based on these and other arguments, El Paso will not be required to submit this information.
4. Although related to question No. 3, El Paso will name the immediately adjacent property user (surface user), if possible. No title search is intended, however.
5. El Paso will add statements to the plan text verifying that no joint use agreements exist or easements are granted on Plant property, and that El Paso owns all plant property.
6. Same as No. 5.
7. El Paso acknowledged that corrections are appropriate and will be made.
8. El Paso has already provided a verbal description of the soil types, with references. Xerox copies of the appropriate Soil Conservation Service maps will, however, be provided.
9. El Paso will add a statement that storm runoff can't enter the plants' collection systems. The physical realities preclude such a problem at these plants. Also, please see item number 21, below.
10. El Paso has already provided as much information as could be found on past operations with a photo history. Consequently El Paso does not have to submit the information requested in number 10.
11. El Paso is in the process of preparing closure plans for both locations. Closure plans cannot be submitted with the discharge plan until after the April 6 meeting alluded to later; however, El Paso will make a determination, and inform the OCD, when they will be submitted.
12. Following considerable discussion as to the reason for this request, a desire by OCD to know if something was being stored or is leaking in the shut-down equipment was identified. To this end El Paso will incorporate a statement that nothing is being stored or is leaking in shut-down equipment.

13. The ponds at Eunice and Monument are known to be drying; however, the exact status of the ponds could not be discussed. The important point was that nothing is being discharged to them now. Despite this, El Paso will incorporate a statement into the plan text indicating that El Paso will pump out any remaining fluids, and the remaining sludge will air dry by evaporation. In addition, a statement on the fate of rain-water in such ponds is expected, if practical.
14. Following a demonstration that standard engineering practices were used to estimate volumes of sewage, you indicated that El Paso will not have to submit any more information on the sewage than has already been given.
- 15 & 16. El Paso will provide a composite analysis protocol to meet Sec. 3-106 (C-1) of the Water Quality Control Commission (WQCC) Regulations. The protocol to be developed by the Environmental Affairs Department (EAD) will include a general discussion of the sampling and testing procedures, data, documentation, and records. The protocol will demonstrate that the composite analysis achieves a proportional-time weighted sampling, reflecting the fluctuating flow characteristics of the plant on a daily to yearly basis. The protocol is to be reviewed with the Agency on April 7, 1983 in Santa Fe. El Paso can develop a protocol which will comply with the regulations.
17. El Paso will provide evapotranspiration vs. infiltration data to show that WQCC standards will not be exceeded in ground water if classifier and tower sludges are placed in a dedicated pit on plant property. The data will be used to show that monitoring in the vados zone is not necessary (Sec. 3-107A 3). Discussions on this topic will be included with the composite analysis protocol on April 7, 1983 in Santa Fe. Part of the same demonstration of no leachate formation is tied to the organic chemical analysis and disposal methods for Jal No. 4 which will also be discussed April 7.
18. El Paso will again verify that, utilizing the referenced methods, hazardous waste is not generated. This methodology was utilized previously. In all probability, a statement will be added to the plan indicating that appropriate hazardous waste analyses will be performed on the classifier and tower sludges to verify non-hazardous characteristics. Considerable time and expense is involved if all wastes must be evaluated accordingly.

19. This item is related to Item 18. Since this meeting, El Paso's EAD has requested and obtained a legal determination from company lawyers that the oil and gas industry is indeed exempt from the RCRA law. In addition, the mixture rule has been reviewed and within certain guidelines, El Paso can implement collection (retention) systems to capture and re-use closed cooling systems containing chromium over 5 ppm, which will constitute legitimate re-use and recycling. Such use is exempt from the hazardous waste regulations. El Paso would welcome the opportunity to review the EPA and New Mexico Hazardous Waste Regulations with you, so that you may satisfy yourself that El Paso's interpretations are correct.

El Paso also respectfully requests that the jurisdiction of the NMOCD over the plants under discussion be reaffirmed by the Water Quality Control Commission.

20. Because this information has already been submitted, no further information is required by the OCD.
21. El Paso will incorporate a statement into the discharge plan text indicating that no flooding potential exists for the collection and drainage system and no open drains are tied into the classifier system.
22. El Paso will incorporate a statement into the discharge plan text indicating that cleaning and disposal of debris and sludge from the collection system will be on an "as-needed" basis, because the system has not been in operation long enough with regular flows to establish a schedule.
23. El Paso's response to this request is contingent on OCD approval of disposal in a dedicated pit on plant property.
24. El Paso will incorporate a statement into the discharge plan text showing that products are not discharged. A brief summary of product types and handling methods will be included.
25. El Paso will indicate that drainlines will be hydrotested on a yearly basis. Verbal agreement was given by you that it is more appropriate, and not a part of this discharge plan, to obtain a separate permit for any hydrostatic testing. If disposal of the hydrotest water would happen to involve the plant effluent disposal system, then OCD would be notified consistent with the WQCC regulations.
26. Similar to question No. 18, El Paso will again verify that hazardous waste activity is not being conducted.
27. This will be covered in the sampling protocol to be supplied by El Paso and reviewed with OCD on April 7, 1983. The point of sampling will be put on one of the many previously submitted drawings.

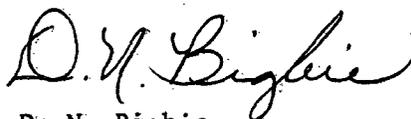
28. Section 3 - 107A (1) is addressed in the draft addendum. Section 3-107A (2 through 10) will not be necessary contingent on the April 7 meeting. However, pursuant to 3-107A (7) El Paso will incorporate a statement into the discharge plan text indicating that all records will be retained for 5 years.
- Pursuant to 3-107A (11) El Paso will add a statement that upon abandonment of facilities all discharges shall cease.
29. The only appropriate response is to reference the wording in the contract between Rice and El Paso.
30. El Paso will not have to submit such a map.
31. If a successful demonstration of the integrity of all gravity flow drains can be made, showing that it is very unlikely that big leaks will develop between yearly tests, this request will be deleted.
32. The testing plans are already referenced in the discharge plan. These plans will be submitted when completed.
33. This request is similiar to Item 24 and El Paso will not have to submit such a plan.
34. This information has already been submitted.
35. The discussions of the various protocols on April 7 will determine the appropriateness of the requests and responses. El Paso does not believe the recommended monitoring wells would provide useful information.
36. Since the EID well is PVC cased, the request is dropped.
37. This request is also part of the protocols to be discussed.
38. The missing figures were located.
39. El Paso will supply engineering specifications on the meters. The location has already been provided.

In summary, El Paso feels that these specific responses and general comments clarify all the remaining questions that must be addressed on the captioned discharged plan. El Paso fully expects to address all the remaining unanswered questions during our upcoming meeting on April 7, 1983. The primary objective of the submittal of discharge plans is to make the demonstrations that degradation of groundwater is prevented. During the nearly three years that have passed since the first request for a discharge plan for Eunice Plant (April 29, 1980), El Paso has spent over \$5,000,000 on wastewater collection systems in Lea County, New Mexico. The systems meet the standards of performance consistent

March 18, 1983

with technical practicability and economic reasonableness required by the New Mexico Oil Conservation Division as a constituent member of the Water Quality Control Commission. The wastewater systems now installed and working at Eunice and Monument Plants are designed exactly like the one at El Paso's Jal No. 4 Plant which was approved by the OCD from construction drawings prior to the construction of the disposal system. El Paso now wishes the approval process of the captioned discharge plan to catch up with the realities that exist at both locations; namely, expensive and effective wastewater collection systems are installed and operating properly at both locations. El Paso believes that the operating systems meet the requirements and objectives of the New Mexico Clean Water Act ["to prevent or abate water pollution"], and respectfully requests the New Mexico Oil Conservation Division's early approval of the plans.

Very truly yours,



D. N. Bigbie
Assistant Division Superintendent

DNB/mts

MONTHLY WATER DISPOSAL REPORT

Submit this report in triplicate to the appropriate District Office, Oil Conservation Division

Disposal System El Paso Natural Gas Disposal System Eunice Plt.

County Lea Month February 19 83

LEASE	WELL NO.	LOCATION				DISPOSED WATER BARRELS	CUMULATIVE DISPOSED WATER-BARRELS	AVERAGE INJECTION PRESSURES
		UL	S	T	R			
Eunice Plant	Rice Eng.		5	21	36			
TOTAL						35,060	76,460	1 lb.

I hereby certify that the above is true and complete to the best of my knowledge and belief.

Signature: W A Kemp Name W A Kemp
 Company El Paso Natural Gas
 Title Plant Superintendent

MONTHLY WATER DISPOSAL REPORT

Submit this report in triplicate to the appropriate District Office, Oil Conservation Division

Disposal System El Paso Natural Gas Disposal System Eunice Plt.

County Lea Month Jan. 19 83

LEASE	WELL NO.	LOCATION				DISPOSED WATER BARRELS	CUMULATIVE DISPOSED WATER-BARRELS	AVERAGE INJECTION PRESSURES
		UL	S	T	R			
Eunice Plant	Rice Eng.		5	21	36			
TOTAL						41,400	41,400	35 lbs

*Some
w/ain south
Mr.
Bennis 2448
3952551*

[Signature]

I hereby certify that the above is true and complete to the best of my knowledge and belief.

Remarks: _____ Name W A Kemper 3943255
Company El Paso Natural Gas Company
Title Sup. Plant



STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR
LARRY KEHOE
SECRETARY

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-2434

October 28, 1981

El Paso Natural Gas Company
Two Petroleum Center / Suite 200
North "A" at Wadley
Midland, Texas 79701

ATTENTION: Mr. M. E. McEwen

RE: Monument & Eunice
Discharge Plan

Dear Mr. McEwen:

In response to our telephone conversation on October 28, 1981, the Oil Conservation Division will grant El Paso Natural Gas Company an extension of time to the date of November 21, 1981, for Monument and Eunice discharge plans.

The extension was granted on the premise that El Paso needs additional time to firm up negotiations with Rice Engineering. Please disregard my letter of October 27, 1981, for the exception of the request to submit a detailed progress report for the Monument and Eunice plants since notification. These reports should include estimated time frames and completion dates for use of Rice Engineering injection system and other alternatives such as El Paso's own injection system. The OCD requests that the report be submitted to me within one month from the date of this letter.

If you have any questions on this matter, please call me at (505) 827-2534.

Sincerely,

A handwritten signature in cursive script that reads "Oscar A. Simpson, III".

Oscar A. Simpson, III
Water Resource Specialist

OAS/dp



STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

LARRY KEHOE
SECRETARY

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87500
(505) 827-2434

October 27, 1981

El Paso Natural Gas Company
Two Petroleum Center/ Suite 200
North "A" at Wadley
Midland, Texas 79701

ATTENTION: Mr. M. E. McEwen

Dear Mr. McEwen:

In response to El Paso's letter of September 11, 1981 and October 9, 1981, requesting six-month extensions for Monument and Eunice Discharge Plans respectively, the Oil Conservation Division will not grant the extensions without sufficient evidence that such extensions are necessary.

The Oil Conservation Division requests that El Paso submit such documentation to substantiate your requests, and provide progress reports for Monument and Eunice Plants since notification began. The letters of September and October only reiterate reasons for extension of time that were given in a previous letter of March 24, 1981 by Mr. Smythe.

Sincerely,

Oscar A. Simpson,
Water Resource Specialist

cc: E. F. Smythe
Environmental Affairs
P.O. Box 1492
El Paso, Texas 79978



El Paso
Natural Gas Company

RECEIVED
OCT 13 1981
OIL CONSERVATION DIVISION
SANTA FE

E 10
TWO PETROLEUM CENTER / SUITE 200
NORTH "A" AT WADLEY
MIDLAND, TEXAS 79701
PHONE: 915-684-5701

October 9, 1981

Mr. Joe D. Ramey, Director
New Mexico Oil Conservation Division
P. O. Box 2088
Santa Fe, NM 87501

Subject: Waste Water Discharge Plans:
El Paso Natural Gas Company
Eunice Plant

Dear Mr. Ramey:

This letter is to request a six-month extension of the present due date for the referenced discharge plan from October 16, 1981 to April 16, 1982.

This extension is requested to allow sufficient time to complete negotiations with Rice Engineering and Operations Company (Rice) of Hobbs, and perform economic alternative evaluation to include drilling and operating our own disposal well.

Enclosed please find a copy of a letter detailing Rice's policy regarding additions to the Eunice-Monument-Eumont (E-M-E) SWD System. El Paso's proposed wastewater disposal involves the same system (E-M-E- SWD System), only a different branch. El Paso must await budget approval and approval by the owners before Rice will consider disposal of additional waste water from our Eunice Plant.

Respectfully,

M. E. McEuen
ME

M. E. McEuen
Division Superintendent

MEMcE/kgs

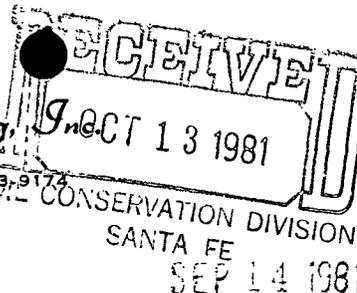
Enclosures

*When will budget approval
be made
& with one others?*

RICE Engineering & Operating

122 WEST TAYLOR TELEPHONE (505) 393-9173

HOBBS, NEW MEXICO 88240
September 10, 1981



El Paso Natural Gas Company
P. O. Box 1384
Jal, New Mexico 88252

Attention: Mr. Larry E. Anderson

Re: E-M-E SWD System
Lea County, New Mexico
(EPNG Monument Plant
Disposal)

*waste water
Discharge Plan*

Gentlemen:

This is in response to your telephone request as to the time frame of alleviation of capacity problem in the vicinity of your Monument Plant in the E-M-E SWD System. Our AFE No. H-388 has been prepared and circulated to convert an existing P & A well to an SWD Well in the restricted area. Contingent upon approval by the Operators, *when?* we anticipate successful conversion and completion of the well by around December, 1981 with construction of terminal facilities and tie line to the existing system in the first quarter of 1982. At such time we can further con- *—?* sider the disposal of waste water from your Monument Plant.

Please advise if we can supply any additional information at this time.

Yours very truly,

RICE ENGINEERING & OPERATING, INC.

L. B. Goddheart
L. B. Goddheart
Division Manager

JEL/ac

JWC

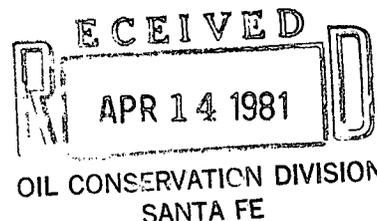


El Paso NATURAL GAS
COMPANY

P. O. BOX 1492
EL PASO, TEXAS 79978
PHONE: 915-543-2600

E 9

April 9, 1981



Mr. Joe D. Ramey, Director
New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87501

Subject: Waste Water Discharge Plans - El Paso
Natural Gas Company Eunice, Jal No. 1,
and Monument Plants

Dear Mr. Ramey:

In your recent correspondence granting due date extensions for the discharge plans for the above referenced plants, you asked what alternative methods El Paso is considering in the event Rice Engineering and/or the City of Jal deny us the use of their facilities.

We have discussed this with our field management and they advise that the only practical alternative presently being considered in the event this should happen, is to dispose of the waste waters in Company owned and operated disposal wells.

The wells would be budgeted for FY 1982 and would be drilled and equipped after receipt of a permit from the Oil Conservation Division.

Yours very truly,

E. F. Smythe, P.E.
Chief - Permits
Environmental Affairs

sg



STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

ES

BRUCE KING
GOVERNOR
LARRY KEHOE
SECRETARY

March 30, 1981

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-2434

Mr. E. F. Smythe
El Paso Natural Gas Company
Box 1492
El Paso, Texas 79978

Dear Mr. Smythe:

An extension of six months for discharge plans for your Eunice, Monument, and Jal No. 1 Plants is granted for the reasons outlined in your letter of March 24, 1981.

The only question I would have is what alternative methods are you looking at should Rice and the City of Jal deny you the use of their facilities.

Yours very truly,

JOE D. RAMEY
Director

JDR/fd



El Paso NATURAL GAS
COMPANY

RECEIVED
MAR 30 1981
OIL CONSERVATION DIVISION
SANTA FE
P. O. BOX 1492
EL PASO, TEXAS 79978
PHONE: 915-543-2600

E 7

March 24, 1981

Mr. Joe D. Ramey, Director
New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, NM 87501

Subject: Waste Water Discharge Plans - El Paso Natural Gas
Company (El Paso) Eunice, Jal No. 1 and Monument Plants

Dear Mr. Ramey,

During a recent meeting between yourself and representatives of the El Paso Natural Gas Company, it was pointed out that final determinations regarding the waste water discharge plans for the Eunice, Jal No. 1, and Monument Plants were contingent upon the results of El Paso's ongoing negotiations with third parties. The specific details include:

1. El Paso is presently negotiating with the Rice Engineering and Operation's Company (Rice) of Hobbs, the operating company of a cooperatively owned disposal system, to take the waste waters from the Eunice and Monument Plants for deep well disposal.

? June 24
A decision among the members of the cooperative regarding the financial charges for the extension of service to El Paso will not be forthcoming for at least three more months. When the decision is reached, El Paso will then have to conduct a cost/benefit analysis to ascertain the viability of this approach as well as other possible alternatives.

- ? 2. El Paso is negotiating with the City of Jal regarding the possibility of sending waste water from the Jal No. 1 plant to the City's EPA approved sewage treatment plant that is now under construction and scheduled for completion in 1982. Here again, a cost/benefit analysis must be conducted to determine the viability of all alternatives.

Mr. Joe D. Ramey
March 24, 1981
Page Two

On the basis of these uncontrollable third party actions, El Paso would like to request 6-month extensions to the present discharge plan due dates of the Eunice, Jal No. 1, and Monument Plants. These due dates being April 16, May 25, and March 27, respectively.

Yours very truly,

E. F. Smythe

E. F. Smythe, P.E.
Chief, Permits & Inventories
Environmental Affairs Department

mh

OCT 16 EUNICE
JAL 12 NOV 25
SEP 27 1981 MONUMENT



STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

EG

BRUCE KING
GOVERNOR
LARRY KEHOE
SECRETARY

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-2434

January 16, 1981

Mr. E. F. Smythe, P.E.
Chief, Permits & Inventories
Environmental Affairs Department
El Paso Natural Gas Company
P. O. Box 1492
El Paso, Texas 79978

Re: Time Extension for Eunice
Plant Waste Water Discharge
Plan

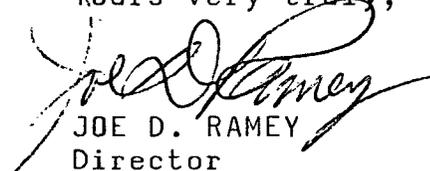
Dear Mr. Smythe:

We have received your letter of January 12, 1981,
concerning your request for an extension of 90 days.

The information El Paso submitted shows good cause
why the Oil Conservation Division should grant a time exten-
sion. The due date is hereby extended to April 16, 1981.

Please let us know if you have any problems with this
arrangement.

Yours very truly,


JOE D. RAMEY
Director

JDR/TP/fd

cc: Oil Conservation Division - Hobbs
El Paso Natural Gas Co., P. O. Box 66, Oil Center 88266

El Paso NATURAL GAS
COMPANY

P. O. BOX 1492
EL PASO, TEXAS 79978
PHONE: 915-543-2600

ES

January 12, 1981

Mr. Thomas Parkhill
New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, NM 87501

Subject: El Paso Natural Gas Company (El Paso)
Eunice, Jal No. 2 and Jal No. 3 Waste Water Discharge Plans

Dear Mr. Parkhill:

During the recent telephone conversation between yourself and our Mr. Larry Anderson, Larry pointed out that the classifier system at the Eunice Plant will not be operational until mid-February (at the earliest). And because of this, he will not be able to obtain the actual plant waste water flows necessary to develop the plant waste water discharge plan before the plan's current due date.

Larry also advised that the in-service date for the Jal No. 3 waste water injection system will occur after the current due date for the Jal No. 3 Plant waste water discharge plan. As Larry explained, it is necessary to have the injection system in operation to determine if the well can handle all the waste waters produced at the Jal No. 3 Plant. And, inasmuch as the pit at the old Jal No. 2 location is used for sewage from Jal No. 3 and will be included in the Jal No. 3 total flow, the Jal No. 2 discharge plan cannot be developed until the results of the Jal No. 3 injection system have been determined.

On the basis of these contingencies, El Paso hereby requests 90-day extensions to the current due dates for the Eunice, Jal No. 2 and Jal No. 3 waste water discharge plans.

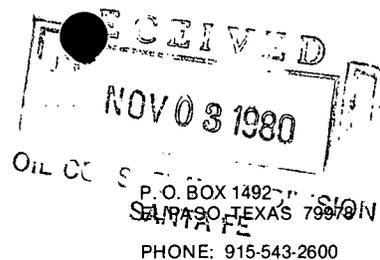
Very truly yours,



E. F. Smythe, P.E.
Chief, Permits & Inventories
Environmental Affairs Department

EFS:gb

El Paso NATURAL GAS
COMPANY



E4

October 30, 1980

Mr. Joe D. Ramey
Director
New Mexico Oil Conservation Division
P. O. Box 2088
Santa Fe, New Mexico 87501

Subject: El Paso Natural Gas Company -
Eunice Treating Plant Waste
Water Discharge Plan

Dear Mr. Ramey:

Pursuant to your letter dated June 10, 1980, the El Paso Natural Gas Company (El Paso) hereby offers the following information in regard to progress being accomplished on the waste water discharge plan for the Eunice Plant.

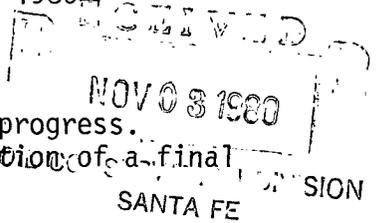
As you know, several equipment and operating changes had been planned which have the effect of changing the actual discharges to be controlled. Several of these changes have since been accomplished:

1. The treating plant, with its associated cooling tower and boiler plant, were taken out of service during the early part of October.
2. The oil classifier has not been installed as yet; however, the material has been ordered with an expected delivery date of December 22, 1980.
3. The small boilers necessary for operation of the sulfur recovery unit have been installed but are experiencing start-up problems at this time. The blowdown from these boilers is important in the reduction of hexavalent chromium to trivalent chromium in the water disposal system.

Mr. Joe D. Rame

-2-

October 30, 1980



Sampling and analysis of the waste water is now in progress. Results from these analyses will assist in the determination of a final disposal method for the water.

Yours very truly,

A handwritten signature in cursive script that reads "E. F. Smythe".

E. F. Smythe, P.E.
Chief, Permits & Inventories
Environmental Affairs

pb

cc: File PDP-12

El Paso NATURAL GAS COMPANY



P. O. BOX 1492
EL PASO, TEXAS 79978
PHONE: 915-543-2600

September 18, 1980

*Tom:
What's your
opinion of this?
JDR*

Mr. Joe D. Ramey
New Mexico Oil Conservation Commission
P. O. Box 2088
Santa Fe, New Mexico 87501

Subject: Waste Water Discharge Plans

Dear Mr. Ramey,

As you are aware, the U. S. Environmental Protection Agency (EPA) recently promulgated a comprehensive set of regulations pertaining to the management of hazardous waste activity.

Pursuant to the regulations, El Paso has been making analytical evaluations necessary to determine if hazardous waste activities are conducted at any of its plants.

One of the characteristics established by EPA for determining hazardous waste activity is the Extraction Procedure Toxicity (EP Toxicity) test. The test procedure was designed to identify wastes likely to leach hazardous concentrations of particular constituents into the groundwater under conditions of improper management.

Under the E P Toxicity procedure, constituents are extracted from the waste in a manner designed to simulate leaching action. This extract is then analyzed to determine whether it possesses any of the contaminants identified in the National Interim Primary Drinking Water Standards (NIPDWS). If the extract contains any of the contaminants in concentrations 100 times greater than that specified in the National Interim Primary Drinking Water Standards, the waste is considered to be hazardous. (To duplicate the attenuation in concentration expected to occur between the point of leachate generation and the point of human or environmental exposure, EPA applied a dilution factor of 100 to the concentration of constituents observed in the test extract.)



STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

E 3

BRUCE KING
GOVERNOR
LARRY KEHOE
SECRETARY

June 10, 1980

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-2434

Mr. E. F. Smythe, P.E.
Chief, Permits & Inventories
Environmental Affairs
El Paso Natural Gas Company
P. O. Box 1492
El Paso, Texas 79978

Re: Time Extension for Eunice
Treating Plant Waste Water
Discharge Plan

Dear Mr. Smythe:

We have received your letter of June 2, 1980, concerning your request to change the effective date of the Eunice Treating Plant discharge plan notice. The Oil Conservation Division is not permitted to change the effective date of the discharge plan, but we can grant a time extension for completing the discharge plan.

The information El Paso submitted shows good cause why the Division should grant a time extension. The due date is hereby (extended to February 2, 1981), with the provision that El Paso submit a discharge plan progress report to the Division on November 3, 1980.

Please let us know if this arrangement is satisfactory.

Yours very truly,

JOE D. RAMEY
Director

JDR/TP/fd



STATE OF NEW MEXICO
ENERGY AND MINERALS DEPARTMENT
OIL CONSERVATION DIVISION

E (1)

BRUCE KING
GOVERNOR

LARRY KEHOE
SECRETARY

POST OFFICE BOX 2088
STATE LAND OFFICE BUILDING
SANTA FE, NEW MEXICO 87501
(505) 827-2434

April 29, 1980

Mr. M. E. McEuen
Division Superintendent
Permian Division
El Paso Natural Gas Company
600 Building of the Southwest
Midland, Texas 79709

Re: Request for Discharge Plan

Dear Mr. McEuen:

Under provisions of the regulations of the Water Quality Control Commission I am hereby requesting the filing of a discharge plan for El Paso's Eunice Processing Plant located in Section 5, Township 21 South, Range 36 East, Lea County, New Mexico.

This plan should cover all discharges of effluent at the plant site or adjacent to the plant site. Section 3-106 A. of the regulations requires submittal of the discharge plan within 120 days of receipt of this notice unless an extension of this time period is sought and approved.

The discharge plan should be prepared in accordance with Part 3 of the Regulations, a copy of which is forwarded herewith. Due to a recent court decision references to "toxic pollutants" may be ignored.

If there are any questions on this matter, please do not hesitate to call me or Thomas Parkhill at 827-3260. Mr. Parkhill has been assigned responsibility for review of all discharge plans.

Yours very truly,

JOE D. RAMEY
Director

JDR/fd
enc.

cc: OCD Hobbs District Office