GW - 49

GENERAL CORRESPONDENCE

YEAR(S):

1990-1985

STATE OF NEW MEXICO

STATE ENGINEER OFFICE

SANTA FE

Carl L. Slingerland
STATE ENGINEER

September 7, 1990

BATAAN MEMORIAL BUILDING
STATE CAPITOL
SANTA FE, NEW MEXICO 87503

Mr. Robert C. Frank
Southwest Water Disposal
Post Office Box 308
Farmington, New Mexico 87499

Re: File No. 4305

Dear Mr. Frank:

Reference is made to the mylar as-built drawings of the Blanco Evaporation Pond which were received in this office on August 29, 1990. We have reviewed the drawings and find them acceptable for filing.

Please let me know if further discussion would be helpful.

Sincerely,

Carl L. Slingerland
State Engineer

By E. L. M.
Eluid L. Martinez
for Chief
Technical Division

ELM:LF:dg
cc: David Boyer, OCD
George Madrid, Western Technologies, Inc.

Memo

From
DAVID G. BOYER
Hydrogeologist

7/19/90

To Cecilia Williams -
EID Air Quality

Attached is complaint from EID Farmington. Our staff checked out Basin Disposal - No emissions now. Notified EPNG and Conoco, but did not notice H_2S during OCD - Aztec office inspections. Some possible odorant (mercaptons?) smell was identified nearby but the source was not obvious. I'm passing to you since EPNG & Conoco have air Quality Permits

Dave

Oil Conservation Division
P.O. Box 2088 Santa Fe, N.M. 87501

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

☑ Telephone ☐ Personal	Time 1600	Date 7/16/90
Originating Party		**Other Parties**
Charles Gholson - OCD Aztec		Bill Olson - OCD Santa Fe

Subject

Bloomfield H_2S Reports

Discussion

Two separate residents south of the Conoco plant have reported symptoms of H_2S exposure.
One is the Tipton residence. The Tiptons live on the 1st road south of the Naba school. Phone # 632-2937
The other resident is the Bennet's. The Bennets live on 310 Salt Lane approximately 200' from the stack. 2 adults and 4 children live there. Phone # 632-1222
These people were referred to Aztec Office by EID Farmington Office

Conclusions or Agreements

In addition, Charles stated that he was at Basin Disposal today and noticed no H_2S odors. Basin is currently down to ~2' ft. freeboard and expects to open when the level is down further

Distribution

Basin Disposal File
OGB

Signed Bill Olson

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

July 2, 1990

CERTIFIED MAIL
RETURN RECEIPT NO. P-918-402-285

Ms. A. N. Pundari
EL PASO NATURAL GAS COMPANY
P. O. Box 4990
Farmington, New Mexico 87499

RE: DISPOSAL OF HYDROTEST WATER

Dear Ms. Pundari:

The Oil Conservation Division (OCD) has reviewed your application, dated June 15, 1990, requesting authorization to dispose of approximately 470 gallons of hydrotest wastewater to a previously approved double-lined pit at EPNG's Blanco Plant. The wastewater will be generated from the hydrotest of 20 feet of 24" used pipe.

The application was submitted pursuant to Water Quality Control Commission (WQCC) Regulation 3-106.B and is hereby approved pursuant to that regulation with the following conditions:

1. All water discharged from the line will be retained in the pit with adequate freeboard to prevent overtopping of the berm. No fluid will be allowed to be discharged or leaked onto the surrounding terrain.

Pursuant to WQCC Regulation 3-106.B, this approval will allow you to discharge without an approved discharge plan for a period not to exceed 120 days. If this site is to be used for more than one hydrotest, formal reapplication must be made. If the discharge exceeds 120 days, a formal discharge plan must be submitted for review.

El Paso Natural Gas Company

P. O. BOX 4990
FARMINGTON, NEW MEXICO 87499

June 15, 1990

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

Dear Mr. Anderson:

El Paso Natural Gas Company proposes to hydrostatic test new and used pipe at Blanco Plant, located at Section 14, T-29N, R-11W. Due to the large number of coal seam gas wells in the area, we are rerouting existing piping in order to facilitate increased throughput at Blanco Plant.

There is one section of pipe to be tested. The section is approximately 20 feet of used 24 inch pipe. The discharge volume is approximately 470 gallons.

Test water will be from Blanco Plant's Reservoir. Water is pumped from Citizens Irrigation Ditch to the reservoir. We plan to discharge hydrostatic test water in a double lined pond located north of Blanco Plant. The pond is presently being used to store water from an oil/water separator.

Upon your approval, we plan to test the pipe in early July 1990. If you have any questions, please call me at 599-2176.

Sincerely,

A. N. Pundari

A. N. Pundari
Compliance Engineer

cc: Ken Beasley
Frank Chavez

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

May 7, 1990

Mr. Osias Uribe
Environmental Specialist
EL PASO NATURAL GAS CO.
P. O. Box 1492
El Paso, Texas 79978

RE: Drainage Testing
Discharge Plan GW-49
Blanco Plant

Dear Mr. Uribe:

The Oil Conservation Division (OCD) has received your request, dated April 25, 1990, to identify those drainlines at the Blanco Plant that require pressure testing. It is a requirement of discharge plan approval or renewal that all wastewater drainlines over twenty five (25) years of age be pressure tested to ensure integrity.

The OCD does not have any knowledge of the age of the drainlines at the facility. EPNG is required to identify those lines over twenty five years old that are still in services and submit to the OCD a program and schedule for pressure testing these lines.

If you have any questions, please do not hesitate to contact me at (505) 827-5884.

Sincerely,

Roger C. Anderson
Environmental Engineer

cc: OCD Aztec District Office

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS
GOVERNOR

January 6, 1990

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

CERTIFIED MAIL
RETURN RECEIPT NO. P-918-402-170

Ms. A. N. Pundari, Compliance Engineer
EL PASO NATURAL GAS COMPANY
P. O. Box 4990
Farmington, New Mexico 87499

Dear Ms. Pundari:

The Oil Conservation Division (OCD) has evaluated your request dated January 2, 1990 to hydrostatically test new and used pipe at the Blanco Plant located in Section 14, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. The pipe will be be tested in two sections utilizing approximately 20,000 gallons of a water/methanol mixture. Discharge of the test water will be to a previously approved double lined pond with leak detection located north of the Blanco Plant.

Based on the information provided in your request, the hydrostatic test is hereby approved.

Pursuant to WQCC Regulation 3-106.B, this approval will allow you to conduct this test without an approved discharge plan for a period not to exceed 120 days. If any test exceeds 120 days, a formal discharge plan must be submitted for review.

Please be advised that the approval of this plan does not relieve you of liability should your operation result in actual pollution of surface or ground waters which may be actionable under other laws and/or regulations.

If there are any questions, please call Roger Anderson at (505) 827-5884.

Sincerely,

William J. LeMay, Director

WJL/RCA/sl

cc: OCD Aztec Office

Please be advised that the approval of this plan does not relieve you of liability should your operation result in actual pollution of surface or ground waters which may be actionable under other laws and/or regulations.

If there are any questions, please call Roger Anderson at (505) 827-5884.

Sincerely,

William J. LeMay
Director

WJL/RCA/sl

OIL CONSERVATION DIVISION
RECEIVED

'90 JAN 8 AM 8 39

El Paso
Natural Gas Company

P.O. BOX 4990
FARMINGTON, NEW MEXICO 87499
PHONE: 505-325-2841

January 5, 1990

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

Dear Mr. Anderson:

El Paso Natural Gas Company proposes to hydrostatic test new and used pipe at Blanco Plant, located at Section 14, T-29N-R-11W. Due to the large number of coal seam gas wells in the area, we are upgrading "A" Plant to allow compression of coal seam gas.

There are two sections of pipe to be tested. The first section is approximately 800 feet of new 24 inch pipe. The second section is approximately 100 feet of used 20 inch pipe and 700 feet of new 20 inch pipe. The pipe will tested with a 30 volume percent methanol mixture . The water/methanol mixture from the first section will be used to test the second section. The discharge volume is approximately 20,000 gallons.

Test water will be from Blanco Plant's Reservoir. Water is pumped from Citizens Irrigation Ditch to the reservoir.We plan to discharge hydrostatic test water in a double lined pond located near Blanco Plant. The pond is presently being used to store water from an oil/water separator.

Upon your approval, we plan to test the pipe on January 29, 1990. If you have any questions, please call me at 599-2176.

A.N. Pundari

A.N. Pundari
Compliance Engineer

cc: Ken Beasley
Frank Chavez

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

November 16, 1989

CERTIFIED MAIL
RETURN RECEIPT NO. P-106-675-180

Mr. Kenneth E. Beasley
EL PASO NATURAL GAS COMPANY
P. O. Box 1492
El Paso, Texas 79978

RE: Discharge Plan GW-49
Secondary Containment Facilities
Blanco Plant

Dear Mr. Beasley:

The Oil Conservation Division (OCD) has received your submittal containing the drawings of proposed berms and curbing for the above referenced facility.

The drawings submitted conform with the requirements in the approved discharge plan and are approved for construction. Notification of the OCD is required when construction is complete.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Roger C. Anderson

Roger C. Anderson
Environmental Engineer

RCA/sl

cc: Aztec District Office
Corazon Halasan, EID

El Paso
Natural Gas Company

OIL CONSERVATION DIVISION
RECEIVED

'89 OCT 30 AM 11 10

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

October 26, 1989

Mr. David Boyer
New Mexico Oil Conservation Division
State Land Office Building
310 Old Santa Fe Trail, Suite 206
Santa Fe, New Mexico 87504

Subject: Blanco Plant Discharge Plan, GW-49

Dear David,

Enclosed for your review are the drawings of proposed berms and curbing as required by the Blanco Plant Discharge Plan. As discussed with Roger Anderson of your office, we have sent the drawings for contractor bidding.

Kenneth E. Beasley

Memo

From
DAVID G. BOYER
Hydrogeologist

To Roger - Fri 9/15/89

Beasley called and wants to put pipes and values at tanks to drain fire berms around tanks if have rainwater inside. He said SOP will be to keep them closed except when in use.

I said fine.

D.

Oil Conservation Division
P.O. Box 2088 Santa Fe, N.M. 87501

El Paso
Natural Gas Company

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

August 14, 1989

Mr. David G. Boyer, Hydrogeologist
Environmental Bureau Chief
New Mexico Energy, Minerals and
Natural Resources Department
Oil Conservation Division
State Land Office Building
310 Old Santa Fe Trail, Room 206
Santa Fe, NM 87503

Reference: Discharge Plan GW-49
Blanco Plant
San Juan County, New Mexico

Dear Mr. Boyer:

We received your letter to Mr. Larry R. Tarver dated March 1, 1989, regarding requirements and comments related to our responses and data provided in the referenced plan. The following are the responses to your requirements and comments:

Requirement

1. A commitment and completion schedule for the berming of all tanks and vessels that contain fluids other than fresh water. The bermed areas shall be large enough to hold one-third more than the volume of the largest vessel or one-third larger than the total volume of all interconnected vessels contained within the berm. (Ref. Section 3, question 3)

Response

1. All berming of tanks will be accomplished as part of the overall wastewater modification project. Various active tanks, some in batteries, will require secondary containment in the form of berming or curbing. This protection will be part of the overall modification design and can be outlined in the design package for your review.

Requirement

2. A commitment and completion schedule for modifying by berming, curbing and paving unpaved process areas that could release fluids (e.g. transfer pumps, valves, overflow lines, etc.) to the ground through leaks, spills, or seal failure. Such modifications should contain the fluids for further recovery for separation treatment and discharge. An example would be use of a small concrete or asphalt pad to collect fluids from a transfer pump in the event of seal failure. (Ref. Section 3, question 3)

Response

2. The gasoline plant at Blanco Plant has been shut down and will eventually be demolished. For this reason, the potential for spills from equipment in liquids service is greatly reduced. Spill protection for the remaining process equipment will be constructed during the wastewater modification project outlined in the discharge plan. Again, this protection will be a part of the overall plant modification and will be outlined in the design package for your review.

Requirement

3. Since the SPCC pond could potentially receive process or plant fluids that could overtop or breach curbs or berms, OCD requests EPNG commit to immediate notification of OCD and mitigation action pursuant to WQCC Section 1-203 if process or plant fluids reach the SPCC pond as a result of a spill, leak or tank breach. This does not alleviate the OCD notification requirement if significant fluids loss occurs at the plant does not reach the SPCC pond. Storm runoff may be discharged form the SPCC pond to grade without further treatment or notification if EPNG analyses show it not to be contaminated with process or storage area fluids. However, EPNG should retain records of such analyses (Ref. Section 3, question 3; Section 6, question 1)

Response

3. EPNG agrees to immediately notify OCD in the event of a spill, leak or tank breach and agrees to mitigate the problem pursuant to WQCC Section 1-203. Before storm runoff is discharged from the SPCC pond to grade, EPNG will sample the runoff to determine if it has been contaminated with process or storage area fluids. EPNG will retain records of such analyses.

Requirement

4. OCD believes that additional investigation/remedial action is needed at the Building "D" seepage site. However, since that spill/leak occurred prior to discharge plan submittal, OCD will not include these activities as part of the discharge plan, but will require remedial action under WQCC 1-203. OCD therefore separates this issue, and will provide EPNG with separate correspondence on the matter (Ref. Section 3, question 4)

Response

4. As per discussion with OCD, EPNG is proceeding with investigation. Furthermore, in response to OCD's verbal request on August 8, 1989, EPNG will investigate the high nitrogen levels detected in MW-2.

Requirement

5. Please revise Plate 2-3 to show effluent lines and destination of wastewater from the Reactor-Clarifier Unit. (Section 3, question 7)

Response

5. Enclosed is the revised Plate 2-3. The Reactor-Clarifier Unit effluent line is shown to connect the 8-inch sanitary sewer which is shown east of the water purification building.

Requirement

6. EPNG's response to question 8, section 3, does not address what investigation procedures are proposed to determine if ground water has been impacted by a significant oil spill. Will soil cores be taken to determine amount of infiltration? Will ground water be monitored? Please discuss the general procedures EPNG proposes to determine if shallow ground water has been affected.

Response

6. If a significant oil spill occurs and a determination is made that groundwater may have been impacted, the proposed investigation procedures EPNG will follow are:

- EPNG will drill soil cores to determine soil characteristics and determine infiltration rates and assess the rate of migration of fluids through the soil hydraulic conductivity and permeability. This information can be used to estimate the probability of the large spill impact on the groundwater.

- If the data shows a high probability exists of impacting groundwater, groundwater monitoring piezometers will be installed to assess the vertical and horizontal extent of the contamination. Also, an upgradient piezometer will be installed to determine background groundwater quality and compare to the groundwater quality under the spilled area.

- Based on the data from the groundwater assessment, the remedial action will be designed.

- Before a remedial action is designed, EPNG will discuss the findings of the groundwater quality study with OCD.

- Before a groundwater quality assessment is conducted, EPNG will mitigate the surface spill by picking up the spilled fluids to preclude further migration into the groundwater.

Requirement

7. Provide a schedule and method for testing all underground wastewater piping and below grade sumps including the classifier and surge basin, not equipped with leak detection. The plant was commissioned in 1953 and OCD's guidelines require positive testing of underground wastewater piping in facilities in excess of 25 years of age. A schematic of all underground piping should be included in the proposal. (Ref. Section 4, question 1)

Response

7. El Paso agrees to establishing a test procedure for drain lines at Blanco Plant. However, it is requested that actual submission of the test program be deferred until after plan approval for the following reasons:

   a) The design of new facilities in the plant will undoubtedly result in the abandonment of some drain lines. It cannot be predicted which lines are involved at this point in the project development. Needless expense would result from testing and possibly replacing some of these lines.

   b) The former gasoline plant has been disconnected and plans are being developed to demolish it. Again, some lines will be removed from service but it is too early to project which ones.

   c) Testing of some lines will require a plant shutdown. A major shutdown is not scheduled at Blanco Plant until mid-1990. The testing program will be developed prior to the shutdown and implemented as sections of the plant come available.

Requirement

8. On Page 6 of your letter, your response to OCD's question 2, Section 4 states EPNG proposes to delay the design and construction of modifications to reduce or reroute wastewater for 90 days after plan approval. Submit the designs of the modifications for review prior to construction.

Response

8. EPNG will submit the designs of the modifications to reduce or reroute wastewater for 90 days after plan approval to OCD for review and approval.

Requirement

9. On Page 12 of your letter you state solid wastes are disposed of in the plant landfill. Expand the discussion on the composition of these wastes. Are the classifier solids and used oil filters drained to remove free liquids before disposal? What is the depth to water below the landfill? What are the characteristics of the subsurface between the landfill and the uppermost groundwater? (Ref. "Miscellaneous," question 4)

Response

9. Solid wastes disposed in the land fill are mainly office trash, some scrap metal, and compressor used oil filters. The composition of classifier solids has not been characterized. The only time classifier solids have been disposed of in recent history was 2 or 3 years ago. The solids were placed in the flare pit. Solids accumulate slowly, and El Paso will characterize them to allow disposal in accordance with applicable regulations.

The depth to groundwater below the landfill has not specifically been determined, but based on the groundwater quality study conducted in 1988, it is estimated to be at approximately 30-50 feet. The subsurface below the plant landfill has not been characterized. However, based on the above groundwater study, and review of geologic information during the study, the following is offered as a description of the characteristics of the subsurface under the landfill:

> The Blanco Plant solid waste disposal area is located on the western flank of an alluvial filled canyon similar to the canyon upon which the Blanco Plant pumping facilities are located. Based on our recent exploration work and geologic literature review of the area used to produce the Groundwater Investigation Report for the Blanco Plant, we infer the following about the solid waste disposal area (SWDA) in the northwest corner of the Blanco Plant property.
>
> 1. Estimated depth to bedrock beneath the SWDA is 20 to 30 feet.
>
> 2. The elevation of the SWDA is high enough above the center of the alluvial filled canyon, and its location is westward enough of the canyon center that no water table aquifer in the alluvium is expected to extend beneath the SWDA.
>
> 3. Since the depositional process that filled both canyons is the same, it is expected that the alluvium in both canyons is very similar. The alluvium beneath the SWDA will consist primarily of silty to slightly clayey silty, fine to medium grained sand.

Requirement

10. EPNG should review 40 CFR, Part 112 to determine if an SPCC plan is necessary. If an SPCC plan is instituted, please provide OCD with a copy. (Ref. "Miscellaneous," question 5)

Response

EPNG has reviewed 40 CFR, Part 112 and has determined that an SPCC is not necessary because, due to the location of the plant, it could not reasonably be expected to discharge oil into or upon the navigable waters of the United States. This determination is based on consideration of the geographical, locational aspects of the facility.

Requirement

11. Please modify Section 8.0, item 2 (reporting) to conform with the reporting commitments shown in Section 3.3.4.

Response

11. Section 8, item 2 (page 8-1) of the discharge plan is changed as indicated below to conform with the reporting commitments shown in Section 3.3.4 of the same document.

"8.0 SUMMARY OF DISCHARGE PLAN REQUIREMENTS

2) Should a release of materials occur, EPNG will provide oral notification to NMOCD as soon as possible after discovery as required by WQCC Regulation 1-203."

If you have questions, please contact me at (915) 541-2146 or Dr. Henry Van at (915) 541-2832.

Very truly yours,

K. E. Beasley by H. Van

Kenneth E. Beasley
Manager, Compliance Engineering

KEB:cds
Enclosures

cc: L. R. Tarver
H. Van

bc: S. D. Aragon
W. H. Healy, Jr.
D. M. Kelsey
G. J. Odegard
A. N. Pundari
L. B. Tinker
File: 5200 w/w

New Mexico Health and Environment Department

CARLA L. MUTH
Secretary

MICHAEL J. BURKHART
Deputy Secretary

RICHARD MITZELFELT
Director

May 11, 1989

Mr. Jim Moore
Director of Public Works
City of Bloomfield
P. O. Box 1839
Bloomfield, New Mexico 87413

Re: Salinity Requirements in NM0020770, Bloomfield WWTP

Dear Mr. Moore:

You had called me on May 2, 1988 regarding the compliance problems that the City of Bloomfield has been having with the salinity limit in its NPDES permit. You asked specifically if the City could apply for a variance to raise the salinity limit to 500 mg/l, what other permittees in New Mexico had similar problems with the salinity limit, and what treatment methods were available to remove salinity.

I have enclosed a copy of the February 28, 1977 "Policy for Implementation of Colorado River Salinity Standards Through the NPDES Permit Program" (Policy.) Part II, Municipal Discharges, A, on page 7, allows for the permitting authority (USEPA) to

> "permit a discharge in excess of the 400 mg/l incremental increase at the time of issuance or reissuance of a NPDES discharge permit, upon satisfactory demonstration by the permittee that it is not practicable to attain the 400 mg/l limit."

Part II, Municipal Discharges, B, starting on page 7, lists the information that the permittee must include for the demonstration.

Sent to EPNG
5/18/89
RKB

— ENVIRONMENTAL IMPROVEMENT DIVISION —
Harold Runnels Building
1190 St. Francis Dr.
Santa Fe, New Mexico 87503

I have also enclosed a copy of the latest "1988 Annual Progress Report, Water Quality Standards for Salinity, Colorado River System, January, 1989" for your information. The permittees in New Mexico that have salinity in their NPDES permit, and their current status, are listed in Appendix A. The Legend is at the start of Appendix A.

In my most current inspection report done under the NPDES permit on October 26-27, 1988 at the Bloomfield Wastewater Treatment Plant, I stated in my cover letter to the City of Bloomfield's Mayor Toliver:

> "The City submitted an incomplete salinity report, and never corrected it. According to the permittee's representatives, two major industrial contributors, El Paso Natural Gas and Conoco, contribute to the high concentrations of salinity being discharged from the City's wastewater treatment plant."

"Salinity" received an "Unsatisfactory" rating on the inspection report, and, under the Further Explanations portion of the report, the following description is given:

> "Two major contributing industries to the Bloomfield wastewater treatment plant are El Paso Natural Gas and Conoco. These two industries contribute 10% of the total flow, according to the permittee's representatives. They also contribute a significant amount of the Total Dissolved Solids (TDS). The contract between the City and Conoco allows Conoco to discharge 1,000 mg/l net TDS to the treatment plant. The City is allowed a net increase of 400 mg/l, according to the "Policy for Implementation of Colorado River Salinity Standards Through the NPDES Permit Program," February 28, 1977. The City exceeds this limit. The City needs to address this problem when it submits the Salinity Report required in the newly reissued NPDES permit NM0020770."

This report is due within 24 months of the effective date of the permit, which is November 15, 1988.

It is the City's responsibility under the "Policy" to demonstrate that it is not practicable to attain the 400 mg/l TDS limit. The City had apparently not assumed a very active role to control some of its sources of salinity at the time of my last inspection. This Division, which has to provide certification of the NPDES permit under Section 401 of the federal Clean Water Act, will be looking for the City's NPDES permit's salinity report (due November 15, 1990) documenting the City's implementation of its salinity control program during the duration of the newly reissued NPDES permit.

Your third request was for some information on the possibility of treating the wastewater to reduce the salinity. I mentioned the best control might be the implementation of the limits in the City's existing sewer use ordinance. Under Section 18-67. "Prohibitions and limitations on discharge into the publicly owned treatment works", (h), "Limitations on pollutant concentrations", the "Maximum Allowable Concentration" for TDS is 500 mg/l (page 1012 of Article III. SEWERS. City of Bloomfield)

In the WASTEWATER TREATMENT AGREEMENT, entered into on February 24, 1988, between the City and Conoco, EXHIBIT B, "Total Dissolved Solids: The difference of influent total dissolved solids and the effluent total dissolved solids will not be greater than 1,000." These discrepancies will have to be justified in the City's demonstration supporting its request for a relaxed salinity requirement in NM0020770, and also in the NPDES permit's required salinity report. The City could renegotiate the contract with Conoco (and any other similar contracts) to lower the salinity concentration limit that the City imposes for discharge into its collection system to make it track with its own sewer use ordinance.

Some other ways to meet the salinity limit in the NPDES permit include but are not limited to treating the wastewater by reverse osmosis, or, in some cases, by treating the wastewater with chemical addition followed by precipitation. I suggest you pose this question to the City's consulting engineer.

If I can answer any questions regarding this information, please call me at 827-2796.

Sincerely,

Ann M. Young

Ann M. Young
Surface Water Section

enclosures

cc: US Environmental Protection Agency, Bob Hiller, 6W-ET
NMHED-EID, Farmington Field Office
State Engineer's Office, Jay Groseclose
Colorado River Basin Salinity Control Forum, Jack A. Barnett, Executive Director

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

GARREY CARRUTHERS
GOVERNOR

March 1, 1989

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

CERTIFIED MAIL
RETURN RECEIPT NO. P-106 675 479

Mr. Larry R. Tarver, Vice President
North Region Operations
EL PASO NATURAL GAS COMPANY
P. O. Box 1492
El Paso , Texas 79978

RE: Discharge Plan GW-49
Blanco Plant
San Juan County, New Mexico

Dear Mr. Tarver:

The Oil Conservation Division (OCD) has received your response, dated January 23, 1989 to our request of October 31, 1988, for additional information pertaining to the above referenced discharge plan application. Unless otherwise noted below, the responses were satisfactory.

The following requirements and comments are based on a review of your responses, the review of the data provided in the plan and the January 27 and February 27, 1989 phone conversations with Dr. Henry Van:

1. A commitment and completion schedule for the berming of all tanks and vessels that contain fluids other than fresh water. The bermed areas shall be large enough to hold one-third more than the volume of the largest vessel or one-third larger than the total volume of all interconnected vessels contained within the berm. (Ref. Section 3, question 3).

2. A commitment and completion schedule for modifying by berming, curbing and paving unpaved process areas that could release fluids (e.g. transfer pumps, valves, overflow lines, etc.) to the ground through leaks, spills, or seal failure. Such modifications should contain the fluids for further recovery for separation treatment and discharge. An example would be use of a small concrete or asphalt pad to collect fluids from a transfer pump in the event of seal failure. (Ref. Section 3, question 3).

3. Since the SPCC pond could potentially receive process or plant fluids that could overtop or breach curbs or berms, OCD requests EPNG commit to immediate notification of OCD and mitigation action pursuant to WQCC Section 1-203 if process or plant fluids reach the SPCC pond as a result of a spill, leak or tank breach. This does not alleviate the OCD notification requirement if significant fluids loss occurs at the plant that does not reach the SPCC pond. Storm runoff may be discharged from the SPCC pond to grade without further treatment or notification if EPNG analyses show it not to be contaminated with process or storage area fluids. However, EPNG should retain records of such analyses (Ref. Section 3, question 3; Section 6, question 1).

4. OCD believes that additional investigation/remedial action is needed at the Building "D" seepage site. However, since that spill/leak occurred prior to discharge plan submittal, OCD will not include these activities as part of the discharge plan, but will require remedial action under WQCC 1-203. OCD therefore separates this issue, and will provide EPNG with separate correspondence on the matter (Ref. Section 3, question 4).

5. Please revise Plate 2-3 to show effluent lines and destination of wastewater from the Reactor-Clarifier Unit. (Section 3, question 7).

6. EPNG's response to question 8, section 3, does not address what investigation procedures are proposed to determine if ground water has been impacted by a significant oil spill. Will soil cores be taken to determine amount of infiltration? Will ground water be monitored? Please discuss the general procedures EPNG proposes to determine if shallow ground water has been affected.

7. Provide a schedule and method for testing all underground wastewater piping and below grade sumps including the classifier and surge basin, not equipped with leak detection. The plant was commissioned in 1953 and OCD's guidelines require positive testing of underground wastewater piping in facilities in excess of 25 years of age. A schematic of all underground piping should be included in the proposal. (Ref. Section 4, question 1).

8. On Page 6 of your letter, your response to OCD's question 2, Section 4 states EPNG proposes to delay the design and construction of modifications to reduce or reroute wastewater for 90 days after plan approval. Submit the designs of the modifications for review prior to construction.

9. On Page 12 of your letter you state solid wastes are disposed of in the plant landfill. Expand the discussion on the composition of these wastes. Are the classifier solids and used oil filters drained to remove free liquids before disposal? What is the depth to water below the landfill? What are the characteristics of the subsurface between the landfill and the uppermost groundwater? (Ref. "Miscellaneous", question 4).

10. EPNG should review 40 CFR, part 112 to determine if a SPCC plan is necessary. If a SPCC plan is instituted, please provide OCD with a copy. (Ref. "Miscellaneous", question 5).

11. Plese modify Section 8.0, item 2 (reporting) to conform with the reporting commitments shown in Section 3.3.4.

If you have any questions, please contact me at (505) 827-5812 or Roger Anderson at (505) 827-5884.

Sincerely,

David G. Boyer, Hydrogeologist
Environmental Bureau Chief

cc: Cora Halason, NMEID Superfund

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

August 21, 1989

CERTIFIED MAIL
RETURN RECEIPT NO. P-106-675-113

Mr. Larry R. Tarver, Vice President
North Region Operations
EL PASO NATURAL GAS COMPANY
P. O. Box 1492
El Paso, Texas 79978

RE: DISCHARGE PLAN GW-49
BLANCO PLANT
SAN JUAN COUNTY, NEW MEXICO

Dear Mr. Tarver:

The ground water discharge plan (GW-49) for the El Paso Natural Gas Company's Blanco Plant located in the N/2 of Section 14, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico, is hereby approved with the following condition:

1. The modifications to reduce or reroute the plant waste water will be completed within two (2) years after discharge plan approval. The modification plan will be submitted to the OCD within 90 days after discharge plan approval. The two year period will provide a reasonable time for planning and construction and has been agreed to by EPNG.

The discharge plan consists of the application dated September 15, 1988 and materials dated January 23, 1989 and August 14, 1989 submitted as supplements to the application.

The discharge plan was submitted pursuant to Section 3-106 of the New Mexico Water Quality Control Commission Regulations. It is approved 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 other than those listed in the plan.

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 August 21, 1994 and you should submit an application for renewal in ample time before that date. It should be noted that 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 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 Aztec Office

El Paso
Natural Gas Company

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

January 23, 1989

Mr. David G. Boyer, Hydrogeologist
Environmental Bureau Chief
New Mexico Oil Conservation Division
Energy, Minerals and Natural Resources Department
State Land Offices Building
310 Old Santa Fe Trail 206
Santa Fe, NM 87504

Reference: **Discharge Plan GW-49**
Blanco Plant, San Juan County, New Mexico

Dear Mr. Boyer:

In reference to your letter of October 31, 1988, the following are the responses to your comments and the additional information you requested. The comments and the additional information are listed per section as indicated in your letter.

Section 2 General Information

Question:

1. Section 2.4 does not indicate whether EPNG still retains ownership of the land now occupied by Conoco plant. Plate 2-1 also shows the cemetery as being within the property boundary.

Answer:

The land now occupied by the Conoco plant has been leased to Conoco for a period of four years beginning in 1985. The land where the cemetery is located belongs to EPNG. Drawing No. 5200.1-X-16 shows the plant property boundaries.

Question:

2. In the introduction provide a short descriptive history of the facility, when it first went into operation, and years major units were put on-line or shut down (including pond use). Provide early copies of early aerial photographs that were provided EID at 4/27/88 Superfund meeting.

Answer:

The EPNG Blanco Plant processed natural gas for the recovery of natural gas liquids during the period of 1953 to 1986. Field gas from gas wells was gathered, compressed to pipeline pressure and routed to the "gasoline" plants where propane, butanes, pentanes and heavier hydrocarbon components (C_3-C_5t) were extracted from the raw gas for sale as natural gas liquid products.

The two "gasoline" plants ("A" and "B" plants) utilized oil absorption technology, in which field gas was contacted with an oil stream similar to kerosene. The oil absorbed from the raw gas some propane, most of the butanes (both iso and normal butane) and essentially all of the pentanes and heavier components (C_5t fraction). The butane and C_5's t were sold to be used as blending components in the production of gasoline for motor fuel, thus the name "gasoline" plant.

The remaining natural gas, with a much more favorable hydrocarbon dewpoint, was dehydrated to remove water and then routed to the company's mainline pipelines for transmission to market. The extracted natural gas liquids were further processed at Blanco for separation from the absorption oil (which was then recycled) and then pipelined to a fractionation plant, where individual hydrocarbon components were separated for sale.

The "A" gasoline plant was commissioned in October 1953 and had a design capacity of approximately 260 MMSCFD. The "B" gasoline plant was placed into operation in October 1956 with a capacity of 300 MMSCFD. Both plants were retired from service on December 1, 1986, as a result of the startup of the adjacent Conoco/Tenneco gas plant.

When operating, the gasoline plants produced wastewater as a result of contact with hydrocarbons, hence the terminology "contact" process (contact wastewater) The wastewater from the "gasoline" plant was routed to the south flare pit. Waste hydrocarbons would be burned-off at the south flare pit. The contact wastewater would be left in this pit to evaporate. This was done from 1953 to 1964, when EPNG contracted with the City of Bloomfield the disposal of its wastewater to the city's wastewater treatment plant.

In order to satisfy moisture content requirements on pipeline-quality natural gas, dry-bed dehydrators were used to remove any remaining water vapor from the gas leaving the "gasoline" plants. These units, which were also removed from service on December 1, 1986, produced a "contact" wastewater stream as well.

Copies of aerial photographs submitted to NMEID at the April 27, 1988 meeting are enclosed.

Section 3 Effluent Sources

Question:

1. Figure 3-2 diagrams the water balance of the plant. A discrepancy exists between input and outflow in many of the units. For example, the input to the domestic water filters is 94.5 gpm while the effluent discharged totals 104.9 gpm plus an unknown amount of backwash. Other discrepancies exist in the numerical portion of the flow diagram.

Answer:

Figure 3-2 has been balanced and redrawn. This figure is enclosed.

Question:

2. Section 3.1.2 indicated the wastewater from the scrubbers/separators contains hydrocarbons that are removed in an oil classifier. Where is the classifier and what is its construction? How is the water conveyed from the scrubbers/separators to the classifier and to the surge basin? What is the surge basin constructed of?

Answer:

The "oil classifier" location is in the center of Plate 2-1. It is also shown as "oil sep." on Plate 2-3, near W26 and S9. It is of concrete construction. Water, with some free and dissolved hydrocarbons, is conveyed from the scrubbers/separators to the surge basin via underground sewers. The forebay of the surge basin serves as an oil separator. The surge basin is of concrete construction.

Question:

3. Section 3.1.8 states storm water from the process area is routed to the SPCC pond and either allowed to evaporate or released. Section 3.3.1 states that the majority of the process and storage areas are bermed or curbed.

   A) Which process and storage areas are not bermed and curbed? Are all of the bermed and curbed areas also paved to prevent spilled liquid infiltration?

   B) Which process and storage areas drain to the SPCC pond? Which are directed to unlined catchment or storage areas?

   C) Is the water in the pond tested prior to release? If the water was tested and found to contain contaminants, how would it be disposed of?

Answer:

(A) The stormwater concrete-lined ditches flowing through process areas collect non-contaminated runoff. Paved areas in process areas collect contaminated water and discharge to sewers which eventually discharge to the surge basin and to the City of Bloomfield wastewater treatment plant.

(B) Several oil storage tanks are unbermed. If leak or overflow occurred, the oil would discharge into the concrete-lined ditches which discharge into the SPCC pond. The oil would immediately be picked up from the SPCC pond. No process contaminated stormwater flows to the SPCC pond.

(C) The water in the SPCC pond would be treated prior to release. The treatment would consist of oil removal only. There has never been a need to treat wastewater in the SPCC because there has never been a spill which has necessitated it.

Question:

4. Section 3.1.14 describes the groundwater extraction well at Compressor "D" building well. Has EPNG analyzed a sample of the groundwater? What is the depth to groundwater? Supply the drillers' logs for this well.

Answer:

EPNG had not sampled the groundwater prior to the sampling conducted during the NMOCD site visit on October 26, 1988. Depth to groundwater is approximately 15-17 feet. Enclosed are the construction details of the "D" seepage well and the report of the preliminary assessment of the subsurface seepage and contamination. The remedial investigation involved source removal as well as removal of the seepage material from the concerned area. Due to a lense of clay, the leaked material was contained in the immediate area. No further migration was noticed. Since a discharge plan was to be prepared and a groundwater quality investigation was to be conducted for the plant, the decision was made not to perform a specific subsurface investigation to determine the impact of this incident. This decision is also valid because there was no migration of the leaked material beyond the boundaries of the excavation for the "D" building turbine foundation (see Figure 1, McBride Ratcliff Report). Also, EPNG thought that if there was to be a problem, the groundwater quality investigation, which took place in September 1988, would detect it.

At this point, our assessment of the situation indicates that the incident does not pose any eminent danger to the environment. EPNG feels confident that the groundwater quality investigation will indicate if there are problems.

Question:

5. Table 3-1 lists the analyses of the waste stream discharged to the City of Bloomfield sewage treatment plant. Some of the constituents appear above W.Q.C.C. standards even after dilution. Has an analysis been performed to determine which plant waste streams contribute these constituents? Are these streams contained in piping or concrete or do they flow through the unlined portions of the system?

Answer:

No analysis has been conducted of each plant waste streams to determine origin of these constituents. At present, plant waste streams are contained in piping systems.

Question:

6. In Table 3-1 why is total chromium less than chromium VI? Is a wastewater analysis for total nitrogen available?

Answer:

Total chromium analysis shows less than chromium VI due to differences in analytical methodologies (see attached letter from CEP lab). No total nitrogen analysis is available, however; ammonia = 0.3 mg/l, nitrite-N = 0.3 mg/l, and nitrate-N = 0.3 mg/l. Therefore, the total nitrogen value is believed to be near 1.0 mg/l, as any organic bound nitrogen is believed to be low.

Question:

7. Section 3.2.3 describes the Reactor-Clarifier. Where is this unit located? How is the wastewater conveyed from the cooling pond to the surge basin?

Answer:

The Reactor-Clarifier is located in the water purification building (see Plate 2-3 location W32+00, S9+00). Wastewater from the cooling pond is conveyed by gravity flow to the surge basin via an underground pipe (see Plate 2-3).

Question:

8. Section 3.3.3 states that after recovery of free liquid from an oil spill, the remaining soil material will be left in place and disked to enhance bio-degradation. Because of the proximity of shallow groundwater and the Citizens Irrigation Ditch, such measures may not be adequate in all cases. What procedures are proposed to determine if a spill has or may impact groundwater, and what remedial actions would be taken?

Answer:

In cases in which disking of the spill-soaked soil is not possible because of its proximity to shallow groundwater and the Citizens Ditch, the soil will be removed and disposed in an environmentally sound manner. The removed soil will be replaced with clean soil and the area contoured.

Section 4 Effluent Disposal

Question:

1. What is the age of the vitrified clay 8-inch sewer line described in Section 4.2? Has any integrity been performed on the line?

Answer:

The vitirified clay 8-inch sewer line described in Section 4.2 was installed in 1954. This sewer line has not been tested for integrity.

Question:

2. Section 4.3 briefly mentions proposed modifications to alter wastewater conduits and holding facilities. Is it anticipated there will be any unlined facilities or conduits in use after the modifications are complete? A more detailed listing of all unlined facilities or water ways that are proposed to be closed must be submitted along with a timetable for closure. If the unlined ditches or any unlined holding facility will remain in use, it must be demonstrated that the fluid flowing in or to these facilities will not contaminate groundwater.

Answer:

There will be no unlined contact wastewater conduits and holding facilities approximately six (6) months from plan approval to construction completion providing there are no delays on material delivery or adverse weather conditions. EPNG proposes to delay implementing the design and construction of the boiler blowdown and evaporation system and closure of the associated pond for 90 days after plan approval. The reason for this 90 day delay is a study that is presently underway to determine whether the shutdown of the boilers at Blanco Plant is feasible. It will take ninety (90) days for pond closure depending on the number of warm months. This will depend on when the plan is approved and construction of new facilities completed. If construction is completed in winter it would probably be necessary to wait until spring for closure.

Section 5 Site Characteristics

Question:

1. Section 5.6 states that the two drainage ditches carrying offsite water through the property could not contain runoff from a severe storm event which would cause local flooding in the vicinity of the ditches. What units would be flooded from the 100-year event? How does El Paso propose to protect these units from flooding and possible failure? Will the flooding be contained on property, or would the irrigation ditch be breached in the event of a 100-year flood?

Answer:

The 100-year flood identified in Table 5-1 would not affect any Blanco Plant units, and consequently no special flood protection is required.

Seventy-five percent of the 100-year flood discharge would be channeled into the east-side ditch. The remaining flood discharge would be essentially evenly distributed across the north boundary as sheet flow into the plant with a maximum depth of approximately one inch. Water would not pond around plant facilities due to the moderate topographic slope to the south.

Calculations show that even if the total peak discharge (610 cfs) were channeled along the east-side ditch, the edges of this flow would not reach Compressor Building "C" (closest facility to the ditch). Similarly, calculations, which conservatively assume that most of the sheet flow (25% of peak discharge) reaches the west-side ditch, indicate the edge of the discharge flow would not reach the Boiler Building (closest facility).

The flooding would not be contained within the plant properly. The natural topographic low areas south of the flair pit and small evaporation pond would fill; the remaining discharge would flow southward over Citizens Ditch. The ditch would probably already be overflowing due to the storm runoff's discharging into it along its course through the entire area affected by the 100-year storm.

Section 6 Monitoring and Reporting

Question:

1. This section states the wastewater discharged to the City of Bloomfield will be sampled and analyzed yearly. No mention is made of storm runoff from process areas that collects in the SPCC pond. Any fluids collected in this pond must be analyzed to determine proper disposition.

Answer:

Fluids collected in the SPCC pond will be analyzed prior to release or treatment.

Question:

2. Not all W.Q.C.C. parameters need to be sampled yearly unless required by another agency (e.g., City of Bloomfield). OCD is willing to work with EPNG to reduce the number of constituents to be sampled.

Answer:

This is certainly acceptable to EPNG. However, due to contractual agreement with the City of Bloomfield Wastewater Treatment Plant the following parameters have been required prior to treatment:

Analyses to be performed quarterly for three quarters, then annually thereafter:

Aluminum, dissolved
Antimony
Arsenic
Barium
Boron
Cadmium
Chromium, total
Chromium, hexavalent
Cobalt
Copper
Cyanide, total
Fluoride
Lead
Manganese
Mercury
Nickel
Selenium
Silver
Titanium, dissolved
Zinc

Analyses to be performed quarterly:

Iron
Phenols
Total Kjeldahl Nitrogen (TKN)
Oil and Grease
Phosphates
Nitrates

Biochemical Oxygen Demand (BOD)
Chemical Oxygen Demand (COD)
Total Dissolved Solids (TDS)
Total Suspended Solids (TSS)

Analyses to be done monthly:

BOD, COD, TDS, TSS

Quality limitations for the wastewater discharged by the Blanco Plant to the City of Bloomfield Wastewaster Treatment Plant will be as follows:

BOD (5-day)	200 mg/l
COD	500 mg/l
Oil & Grease (Freon Ext.)	35 mg/l
TSS	200 mg/l
Phosphate	15 mg/l
Nitrate	20 mg/l
pH (Standard Units)	Max. 8.6
	Min. 6.6

TDS: The difference of influent TDS and the effluent TDS will not be greater than 1000 mg/l.

Question:

3. Does EPNG plan to report the annual analyses to OCD? If so, analyses should be submitted within 30 days of company receipt and verification.

Answer:

Yes, EPNG will submit a copy of the annual analyses to NMOCD within 30 days of company receipt and verification.

Appendix C Material Safety Data Sheets

Question:

1. A comparison of the MSD's included in Appendix C with the list of chemicals used at the facility appearing in Table 3-2 (page 3-15) revealed the appendix to be incomplete. The following discrepancies were noted with the chemical number corresponding with the numbers listed in Table 3-2.

   - No MSD sheets - No. 21
   - Only page 1 included - Nos. 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 20, 24.

Answer:

- MSD sheet for chemical No. 21 of Table 3-2 corresponds to Mobil 797, turbine oil. The MSD for this chemical is contained in Appendix C of the discharge plan. However, if this MSDS is missing in the copies submitted to NMOCD, EPNG encloses another copy for NMOCD's files.

- Page 2 of MSDS corresponding to Table 3-2 chemicals Nos. 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 20, and 24 are enclosed.

Plates

The following questions arose from a review of the schematics of the wastewater disposal plan.

Questions:

Plate 2-3

1. The API Separator at S7,W27 has flow into it but appears not to have a discharge line.

2. Ditch No. 2 at S3, W28 to W29 shows flow to the east that ends at the W28 line with no further outlet.

3. The cooling tower at S5, W24 has no blowndown drain lines.

4. The 6" backwash drain at S4, W23 is discontinuous with no indication where it goes.

5. The 8" drain at S8, W26 has a north flow arrow where flow is indicated to the south.

6. The drain line from the crude oil storage (plate 2-5) to the API separator (plate 2-4) is not depicted as it crosses plate 2-3 at S9 to S10, W34 to W35.

7. There are ditches A, B and D shown but no depiction of ditch C. Is there a ditch C?

Plate 2-4:

1. There is no indication of a ditch, line or drain from the cooling pond to the surge basin.

Answers:

Plate 1-3:

1. Revised Plate 1-3 is enclosed and shows the API separator discharge line.

2. Ties into Ditch C. flowing south.

3. This cooling tower does not exit any more. Plate 2-3 has been revised.

4. It discharges to the 8" drain at W26 ad S28 (see enclosed revised Plate 2-3).

5. The north flow arrow is actually a symbol for a pipe reducer, in this case.

6. See enclosed revised Plate 2-3.

7. See enclosed revised Plate 2-3.

Plate 2-4:

1. See enclosed revised Plate 2-4.

Miscellaneous

Questions:

The following items were not addressed in your application.

1. How old is the underground piping?

2. Are there any buried flow-thru tanks?

3. Are there any below grade tanks?

4. What is the disposition of solid wastes (e.g., filter media, classifier solids, other plant domestic and industrial waste)?

5. Does the facility have an SPCC plan? If so, please provide a copy for inclusion in the file.

6. Are any chrome based materials being used as additives in the plant? Do any remain as active biocides in any of the water cooling systems?

Answers:

1. Most of the underground piping was installed between 1953 and 1956. However, since 1956 other underground drain piping has been installed.

2. There are no buried flow-thru tanks.

3. There are no below grade tanks.

4. The disposition of solid wastes at Blanco Plant is as follows:

   - Classifier solids: they are disposed at the plant's landfill located on the northeast corner of the plant property. This is done every nine to twelve months.

   - Compressor engine used oil filters: they are disposed at the plant's landfill on the northeast corner of the plant property.

   - Domestic solid waste: this waste is disposed through a private contractor, Waste Control of Farmington, New Mexico.

5. The facility does not have an SPCC plan.

6. The plant is not using any chrome based materials nor do any remain as corrosion inhibitors in water cooling systems.

Because Figure 3-2 (Block Flow Diagram Water Balance) was corrected, we have enclosed pages 3-9, 3-13 and 4-2 of the discharge plan with the new water balance volumes. Also enclosed is a copy of the Groundwater Investigation Report. A copy of this report was sent to Dr. Ron Conrad on January 21, 1989.

If you have any questions, please contact Mr. Kenneth E. Beasley at 915/541-2146 or Dr. Henry Van at 915/541-2832.

Very truly yours,

Larry R. Tarver
Vice President
North Region Operations

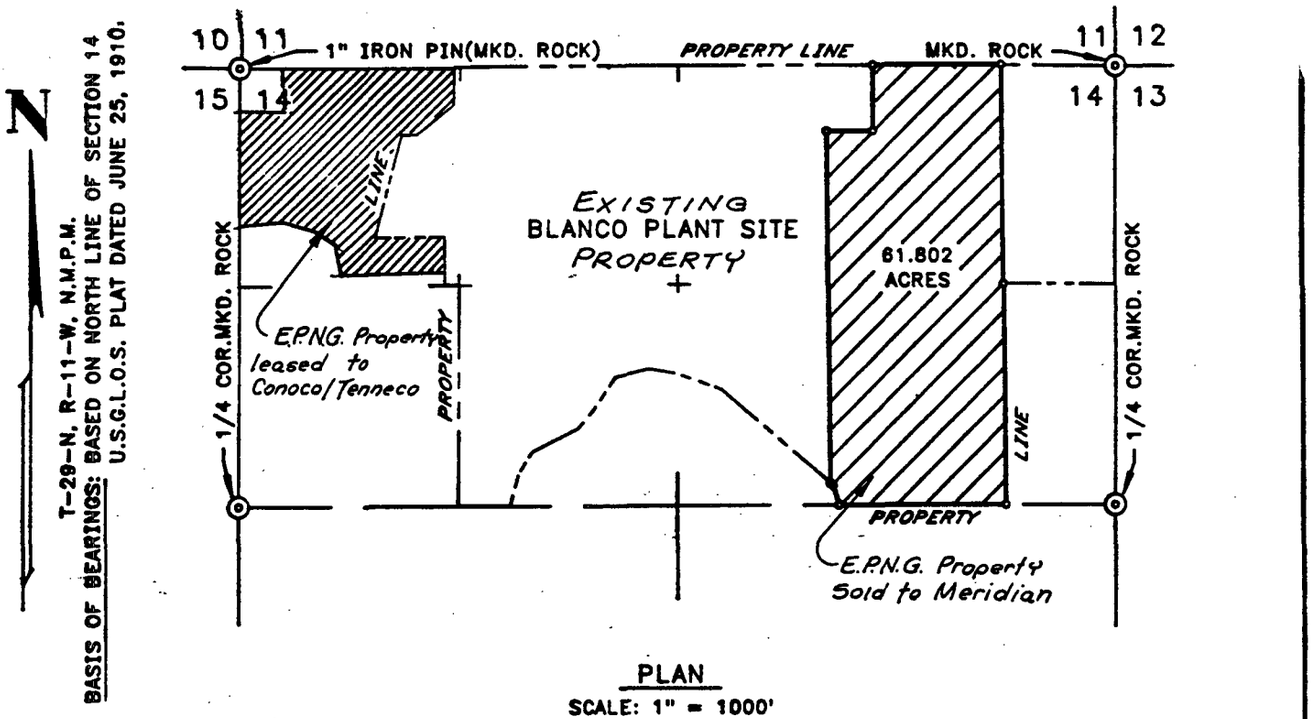
Enclosures

cc: K. E. Beasley (w/ enclosures)

INFORMATION IN SUPPORT OF SECTION 2.0 OF DISCHARGE PLAN GW-49

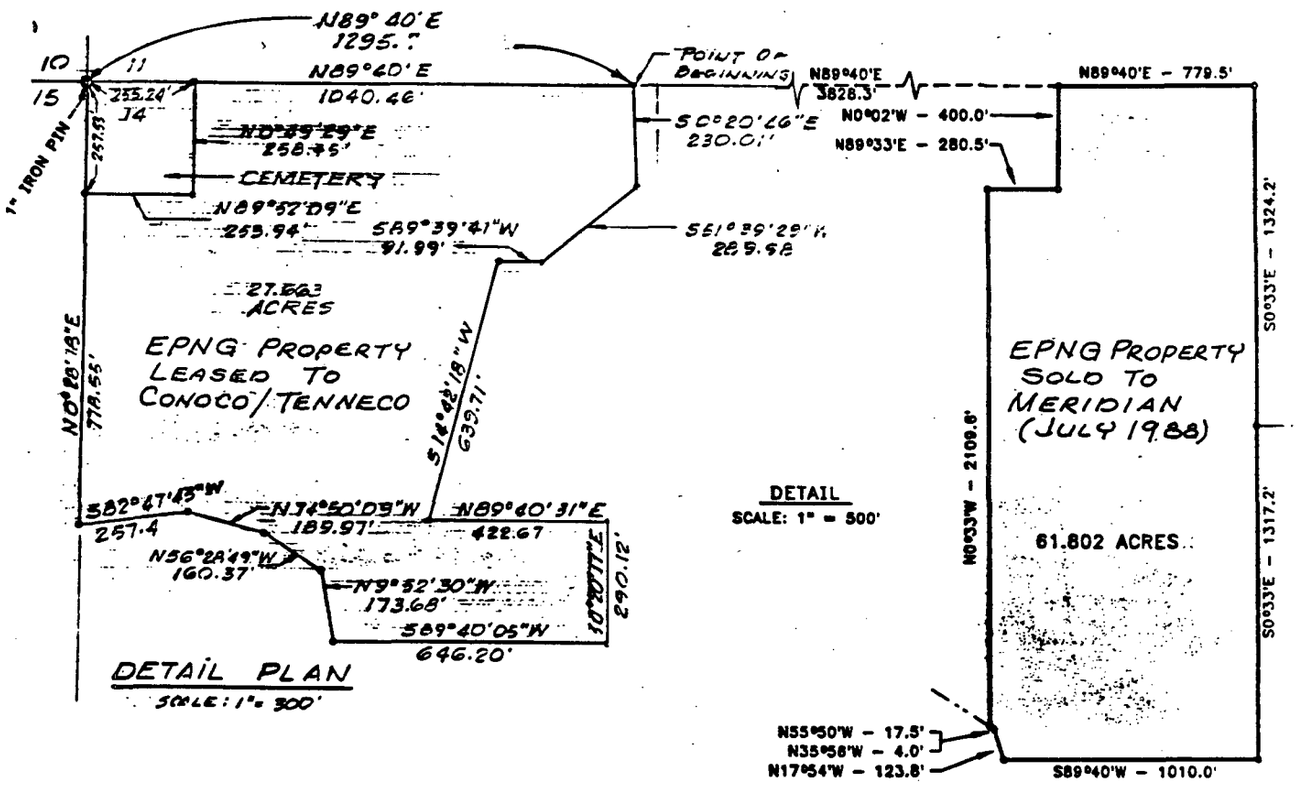
Drawing No. 5200.1-X-16

Paso Natural Gas Co.
Blanco Plant
San Juan County, N. M.



PLAN

SCALE: 1" = 1000'



El Paso NATURAL GAS COMPANY

BLANCO PLANT SITE

SECTION 14, T-29-N, R-11-W, N.M.P.M.
SAN JUAN COUNTY, NEW MEXICO

SCALE	SHOWN	DWG. NO.	5200.1-X-16	REV. A

FM-07-[illegible] 24R [illegible]

INFORMATION
IN SUPPORT OF
DISCHARGE PLAN GW-49

CORRECTED PAGES
3-9,3-13,&4-2
FOR THE
DISCHARGE PLAN
AND
C.E.P. LETTER ON Cr

Entered DJB

Rec'd 1/27/89 DJB

EPNG Blanco Plant

Controls for Environmental Pollution, Inc.

1925 Rosina • P. O. Box 5351 • Santa Fe, New Mexico 87502 • Telephone 505 982-9841

November 3, 1988

Bechtel Environmental
P.O. Box 2166
Houston, TX 77252

Attention: Mr. Dan Vacker

Dear Mr. Vacker:

In July 1988, CEP received water samples for chemical analyses which included tests for total chromium and hexavalent chromium. The results of these tests appear in CEP LAB# 88-08-123.

The issue of conflicting data regarding the chromium results has been brought to our attention which I would like to address. The total chromium was determined by inductively coupled plasma emission spectroscopy (ICP) and was found to be less than 0.01 mg/l. The hexavalent chromium was determined by colorimetry and was found to be 0.11 mg/l. This result was confirmed by duplicate analyses. The obvious conflict in these results points to the fact that often different methods utilizing different technologies do not produce results which ideally correlate. Most generally this is due to differences in the susceptibility to interferences. Low levels of hexavalent chromium, such as in this case, may receive positive interferences from molybdenum, vanadium, mercury and iron. Trace metal analyses when performed by ICP are much less susceptible to chemical or spectral interferences due to the intense heat of the plasma and the enhanced resolution of emission spectra. In the future, CEP will utilize ion chromatography, a newer and superior technology, when performing analyses for hexavalent chromium. This approach will eliminate the kinds of interferences found in colorimetry.

I hope that this information is helpful. If you have any questions, please do not hesitate to call.

Very truly yours,

CONTROLS FOR ENVIRONMENTAL POLLUTION, INC.

Jeffrey R. Tye
Director, Chemical Sciences

JRT:ta

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

November 18, 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John C. Peterson
Field Supervisor
U.S. Dept. of the Interior
Fish and Wildlife Service
3530 Pan American Hwy, N.E.
Albuquerque, New Mexico 87107

RE: Discharge Plan GW-49
El Paso Natural Gas Company
Blanco Plant

Dear Mr. Peterson:

The Oil Conservation Division (OCD) has received your letter dated November 15, 1988, responding to the public notice of the above-referenced proposed ground water discharge plan. Your stated concerns are whether the City of Bloomfield municipal wastewater treatment plant has the capacity to treat the discharges from El Paso Natural Gas (EPNG) Company's plant and if the facilities are capable of removing any toxic substances present prior to discharge into the San Juan River.

The EPNG Blanco Plant has been discharging it's effluent to the City of Bloomfield since 1964 under contract No. 1048. The proposed discharge plan proposes to continue this process. The ponds that are proposed for closure are presently utilized as holding ponds for the effluent prior to introduction into the Bloomfield sewer line. The closure of these ponds will not appreciably increase the volume of discharge to the City's treatment plant. It will, however, eliminate the potential for seepage of effluent to ground water.

The OCD does not have jurisdiction over effluent received by municipal wastewater treatment systems. The Environmental Improvement Division (EID) regulates surface and ground water discharges from municipal facilities, and specific comments on the discharge from the Bloomfield treatment plant should be addressed to them. The EID also certifies NPDES permits (including review for toxic constituents when appropriate) pursuant to the Clean Water Act, EPA and state requirements.

The City of Bloomfield is fully aware of the need to monitor EPNG's effluent and to require EPNG to pretreat the wastewater if needed to meet NPDES permit and other applicable requirements. Based on the effluent disposal and contingency plans contained in the discharge plan application, the OCD feel the steps to be taken are sufficient to assure the protection of ground or surface waters.

A copy of the complete discharge plan application with supplements is available at our Santa Fe office for public review. I hope I have answered your concerns stated in your letter and if you have any questions or further concerns, please do not hesitate to contact Roger Anderson, Environmental Engineer, at (505) 827-5884.

Sincerely,

William J. LeMay
Director

WJL/RCA/sl

Enclosures

cc: OCD - Aztec Office
Director, Game & Fish Dept, Santa Fe
Director, HED, Santa Fe
Regional Administrator, EPA, Dallas
Regional Director, FWS, AWE, Albuquerque

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 FTS 474-7877.

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

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 FTS 474-7877.

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

No. _____

STATE OF NEW MEXICO,
County of San Juan:

_____ being duly

sworn, says: That he is the _____ of

THE FARMINGTON DAILY TIMES, a daily newspaper of general circulation published in English at Farmington, said county and state, and that the

hereto attached _____

_____

was published in a regular and entire issue of the said FARMINGTON DAILY TIMES, a daily newspaper duly qualified for the purpose within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico for one consecutive (days) (weeks) on the same day as follows:

First Publication _____

Second Publication _____

Third Publication _____

Fourth Publication _____

and that payment therefor in the amount of $_____

has been made.

_____

Subscribed and sworn to before me this _____ day

of _____, 19__.

_____
NOTARY PUBLIC, SAN JUAN COUNTY, NEW MEXICO

My Commission expires: June 23, 1990

Copy of Publication

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

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

(GW-49) El Paso Natural Gas Company, Donald N. Bigbie, Vice President, North Region, P. O. Box 1492, El Paso, Texas, 79978, has submitted a discharge plan application for its existing Blanco Plant located approximately 1½ miles northeast of Bloomfield, in the north half of Section 14, Township 29 North, Range 11 West (NMPM), San Juan County, New Mexico. Approximately 119,900 gallons per day of process and cooling tower wastewater with a total dissolved solids content of 1010 mg/l piped to and disposed of through the City of Bloomfield's municipal wastewater treatment facility. The discharge plan proposes closure of unlined process ponds and 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 10 to 50 feet, with total dissolved solids concentrations ranging from 1600 to 6000 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, Director

SEAL

Legal No. 22563 published in the Farmington Daily Times, Farmington, New Mexico on Thursday, October 27, 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 approval 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-49) El Paso Natural Gas Company, Donald N. Bigbie, Vice President, North Region, P.O. Box 1492, El Paso, Texas, 79978, has submitted a discharge plan application for its existing Blanco Plant located approximately 1½ miles northeast of Bloomfield, in the north half of Section 14, Township 29 North, Range 11 West (NMPM), San Juan County, New Mexico. Approximately 119,900 gallons per day of process and cooling tower wastewater with a total dissolved solids content of 1010 mg/l piped to and disposed of through the City of Bloomfield's municipal wastewater treatment facility. The discharge plan proposes closure of unlined process ponds and 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 10 to 50 feet, with total dissolved solids concentrations ranging from 1600 to 6000 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 will 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
s/WILLIAM J. LEMAY, Director

Journal, October 30, 1988

STATE OF NEW MEXICO } ss
County of Bernalillo

THOMAS J. SMITHSON

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

for 1 times, the first publication being on the 30 day of Oct, 1988, and the subsequent consecutive publications on ....., 198.....

Thomas J. Smithson

OFFICIAL SEAL
ANGELA M. ARCHIBEQUE
NOTARY PUBLIC NEW MEXICO
My Commission Expires 6/30/92

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 $ 22.45

Statement to come at end of month.

ACCOUNT NUMBER C80932

EDJ-15 (R-2/86)

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 approval 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-49) El Paso Natural Gas Company, Donald N. Bigbie, Vice President, North Region, P. O. Box 1492, El Paso, Texas, 79978, has submitted a discharge plan application for its existing Blanco Plant located approximately 1½ miles northeast of Bloomfield, in the north half of Section 14, Township 29 North, Range 11 West (NMPM), San Juan County, New Mexico. Approximately 119,900 gallons per day of process and cooling tower wastewater with a total dissolved solids content of 1010 mg/l piped to and disposed of through the City of Bloomfield's municipal wastewater treatment facility. The discharge plan proposes closure of unlined process ponds and 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 10 to 50 feet, with total dissolved solids concentrations ranging from 1600 to 6000 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, Director

S E A L

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 31, 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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-49, Blanco Plant, San Juan County, New Mexico

Dear Mr. Bigbie:

The Oil Conservation (OCD) has received and is in the process of reviewing the above-referenced discharge plan. The plan submitted, dated September 15, 1988, was received by the OCD on September 15, 1988. The following comments and requests for additional information are based on our review of the data provided in the plan and in the Groundwater Quality Investigation work plan dated September, 1988, and on OCD's site visit of October 26, 1988.

Section 2. General Information

1. Section 2.4 does not indicate whether EPNG still retains ownership of the land now occupied by Conoco plant. Plate 2-1 also shows the cemetary as being within the property boundary.

2. In the introduction provide a short descriptive history of the facility, when it first went into operation, and years major units were put on-line or shut down (including pond use). Provide copies of the early aerial photographs that were provided EID at the 4/27/88 Superfund meeting.

Section 3. Effluent Sources

1. Figure 3-2 diagrams the water balance of the plant. A discrepancy exists between input and outflow in many of the units. For example, the input to the domestic water filters

is 94.5 gpm while the effluent discharged totals 104.9 gpm plus an unknown amount of backwash. Other discrepancies exist in the numerical portion of the flow diagram.

2. Section 3.1.2 indicated the wastewater from the scrubbers/separators contains hydrocarbons that are removed in an oil classifier. Where is the classifer and what is its construction? How is the water conveyed from the scrubbers/separators to the classifier and to the surge basin? What is the surge basin constructed of?

3. Section 3.1.8 states storm water from the process area is routed to the SPCC pond and either allowed to evaporate or released. Section 3.3.1 states that the majority of the process and stoage areas are bermed or curbed.

   A) Which process and stoage areas are not bermed and curbed? Are all of the bermed and curbed areas also paved to prevent spilled liquid infiltration?

   B) Which process and storage areas drain to the SPCC pond? Which are directed to unlined catchment or storage areas?

   C) Is the water in the pond tested prior to release? If the water was tested and found to contain contaminants, how would it be disposed of?

4. Section 3.1.14 describes the ground water extraction well at Compressor "D" building well. Has EPNG analyzed a sample of the ground water? What is the depth to ground water? Supply the drillers logs for this well.

5. Table 3-1 lists the analyses of the waste stream discharged to the City of Bloomfield sewage treatment plant. Some of the constitutents appear above W.Q.C.C. standards even after dilution. Has an analysis been performed to determine which plant waste streams contribute these constitutents? Are these streams contained in piping or concrete or do they flow through the unlined portions of the system?

6. In Table 3-1 why is total chromuim less than chromuim, VI? Is a wastewater analysis for total nitrogen available?

7. Section 3.2.3 describes the Reactor-Clarifier. Where is this unit located? How is the wastewater conveyed from the cooling pond to the surge basin?

8. Section 3.3.3 states that after recovery of free liquid from an oil spill, the remaining soil material will be left in place and disked to enhance bio-degradation. Because of the proximity of shallow ground water and the Citizens Irrigation Ditch, such measures may not be adequate in all cases. What procedures are proposed to determine if a spill has or may impact ground water, and what remedial actions would be taken?

Section 4. Effluent Disposal

1. What is the age of the vitrified clay 8-inch sewer line described in Section 4.2? Has any integrity testing been performed on the line?

2. Section 4.3. briefly mentions proposed modifications to alter wastewater conduits and holding facilities. Is it anticipated there will be any unlined facilities or conduits in use after the modifications are complete? A more detailed listing of all unlined facilities or water ways that are proposed to be closed must be submitted along with a timetable for closure. If the unlined ditches or any unlined holding facility will remain in use, it must be demonstrated that the fluid flowing in or to these facilities will not contaminate groundwater.

Section 5 - Site Characteristics

Section 5.6 states that the two drainage ditches carrying offsite water through the property could not contain runoff from a severe storm event which would cause local flooding in the vicinity of the ditches. What units would be flooded from the 100-year event? How does El Paso propose to protect these units from flooding and possible failure? Will the flooding be contained on property, or would the irrgation ditch be breached in the event of a 100-year flood?

Section 6 - Monitoring and Reporting

1. This section states the wastewater discharged to the City of Bloomfield will be sampled and analyzed yearly. No mention is made of storm runoff from process areas that collects in the SPCC pond. Any fluids collected in this pond must be analyzed to determine proper disposition.

2. Not all WQCC parameters need to be sampled yearly unless required by another agency (e.g. City of Bloomfield). OCD is willing to work with EPNG to reduce the number of constitutents to be sampled.

3. Does EPNG plan to report the annual analyses to OCD? If so, analyses should be submitted within 30-days of company receipt and verification.

Appendix C - Materials Safety Data Sheets

A comparison of the MSD's included in Appendix C with the list of chemicals used at the facility appearing in Table 3-2 (page 3-15), revealed the appendix to be incomplete. The following discrepancies were noted with chemical numbers corresponding with the numbers listed in Table 3-2.

- No MSD sheets - No. 21
- Only page 1 included - Nos. 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 20, 24.

Plates

The following questions arose from a review of the schematics of the wastewater disposal plan.

Plate 1-3:

1. The API Separator at S7,W27 has flow into it but appears not to have a discharge line.

2. Ditch No. 2 at S3, W28 to W29 shows flow to the east that ends at the W28 line with no further outlet.

3. The cooling tower at S5, W24 has no blowndown drain lines.

4. The 6" Backwash drain at S4, W23 is discontinuous with no indication where it goes.

5. The 8" drain at S8, W26 has a north flow arrow where flow is indicated to the south.

6. The drain line from the crude oil storage (plate 2-5) to the API separator (plate 2-4) is not depicted as it crosses plate 2-3 at S9 to S10, W34 to W35.

7. There are ditches A, B and D shown but no depiction of a ditch C. Is there a ditch C?

Plate 2-4:

1. There is no indication of a ditch, line or drain from the cooling pond to the surge basin.

Miscellaneous

The following items were not addressed in your application.

1. How old is the underground piping?

2. Are there any buried flow-thru tanks?

3. Are there any below grade tanks?

4. What is the disposition of solid wastes (e.g filter media, classifier solids, other plant domestic and industrial waste)?

5. Does the facility have an SPCC plan? If so please provide a copy for inclusion in the file.

6. Are any chrome based materials being used as additives in the plant? Do any remain as active biocides in any of the water cooling systems?

If you have any questions, please contact myself or Roger Anderson at 827-5812 or 827-5885.

Sincerely

David G. Boyer, Hydrogeologist
Environmental Bureau Chief

DGB:sl

cc: Oil Conservation Division, Aztec
Ron Conrod, EID

El Paso
Natural Gas Company

P. O. BOX 1492
EL PASO, TEXAS 79978

PHONE: 915-541-5362

ALEXANDER H. CARAMEROS VICE PRESIDENT

September 13, 1988

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

Re: Discharge Plan for El Paso Natural Gas Company - Blanco Plant

Dear Mr. LeMay:

Enclosed for your review is the completed Discharge Plan for the El Paso Natural Gas Company Blanco Plant. The plant 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. Kenneth E. Beasley, Manager of Compliance Engineering for the North Region at (915) 541-2146.

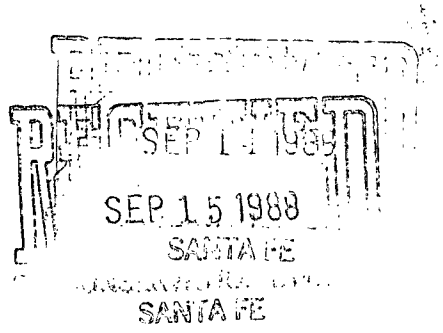
Thank you for your consideration in this matter.

Very truly yours,

A H Carameros

vjh

cc: Dr. Ron Conrad, NMEID



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

August 12, 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dr. Henry Van
EL PASO NATURAL GAS COMPANY
P. O. Box 1492
El Paso, Texas 79978

RE: Discharge Plan GW-49
Blanco Gas Plant
San Juan County, New Mexico

Dear Dr. Van:

The Oil Conservation Division (OCD) has received your request, dated July 28, 1988, for an extension for the submission of a discharge plan for the above referenced facility. The notification requiring the filing of a discharge plan was dated April 21, 1988.

Pursuant to Water Quality Control Commission (W.Q.C.C.) Regulation 3-106.A. and for good cause shown, El Paso Natural Gas Company is hereby granted an extension to September 15, 1988 for the submission of a discharge plan for your Blanco Gas Plant. This extension is granted to allow for the receipt of laboratory analysis and completion of the wastewater characterization.

Pursuant to Water Quality Control Commission Regulation 3-106.A. and for good cause shown, you are further granted an extension to January 15, 1989 for discharge without an approved discharge plan.

This extension is granted to allow for the receipt and review of the required discharge plan.

If you have any questions or comments, please feel free to contact Dave Boyer at (505) 827-5812 or Roger Anderson at (505) 827-5885.

Sincerely,

William J. LeMay
Director

WJL:RA:sl

cc: OCD - Aztec

El Paso
Natural Gas Company

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

July 28, 1988

Mr. David Boyer
Chief
Environmental Bureau
Energy and Mineral Department
Oil Conservation Division
P. O. Box 2088
Sante Fe, New Mexico 87501-2088

Re: El Paso Natural Gas Company - Blanco Plant Discharge Plan

Dear Mr. Boyer:

This is to confirm our telephone conversation concerning the extension of time for the submittal of the discharge plan. Due to the three weeks turn-around time by the laboratory we will need additional time to complete the wastewater characterization. You agreed to allow us to submit the discharge plan by September 15, 1988.

The preparation of the discharge plan is progressing well with the new schedule. We are reviewing the draft groundwater monitoring workplan which will be sent to Dr. R. Conrad and you on August 5, 1988 for review.

If you have any question please contact me at 915/541-2832. Thank you for your understanding and cooperation.

Very truly yours,

Henry Van, Ph.D.
Sr. Environmental Engineer
Environmental & Safety Affairs Department

dsf

cc: Dr. R. Conrad - NMEID

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 21, 1988

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

Dear Mr. Bridges:

Under the provisions of the Water Quality Control Commission (WQCC) Regulations, you are hereby notified that the filing of a discharge plan for your existing Blanco Gas Plant located in the N/2 of Section 14, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico, is required.

This notification of discharge plan requirement is pursuant to Sections 3-104 and 3-106 of the WQCC Regulations. The discharge plan, as defined in Section 1-101.P. of the WQCC Regulations, should cover all discharges of effluent or leachate at the plant site or adjacent to the plant site. Included in the application should be plans for controlling spills and accidental discharges at the facility (including detection of leaks in buried underground tanks and/or piping), and closure plans for any ponds whose use will be discontinued.

A copy of the regulations is enclosed for your convenience. Also enclosed is a copy of an OCD guide to the preparation of discharge plans for gas processing plants. Three copies of your discharge plan should be submitted for review purposes.

Section 3-106-A. of the regulations requires a submittal of the discharge plan within 120 days of receipt of this notice unless an extension of this time period is sought and approved for good cause. Section 3-106.A. also allows the discharge to continue without an approved discharge plan until 240 days after written notification by the director that a discharge plan is required. An extension of this time may be sought and approved for good cause.

If there are any questions on this matter, please feel free to call David Boyer at 827-5812 or Roger Anderson at 827-5885 as they have the assigned responsibility for review of all discharge plans.

Sincerely,

William J. LeMay
Director

WJL:RA:sl

cc: OCD - Aztec
Ron Conrad - NMEID Santa Fe
Ken Beasley - EPNG

El Paso
Feb. '88

Blanco Plant

Modernization includes new turbine, computerized control system

A large gas turbine once destined for Alaska is finding a new home at Blanco Plant in San Juan Division.

The 26,000-horsepower turbine will replace the old "B" Plant reciprocal compressors, which will be taken out of service when the new installation is completed this summer.

The old "B" Plant is being replaced because it was constructed back in 1955 in an area where there is collapsing soil, according to Bill Healy, director of engineering for the San Juan Division.

Settlement problems under and around "B" Plant have resulted in cracked blocks and broken crankshafts in the old compressor engines, Healy explains.

"The Company purchased the big turbine at a very good price," Healy says. He explains that the turbine originally was purchased by another company for use in Alaska. That project never was carried out, so EPNG acquired the turbine at a very reduced price.

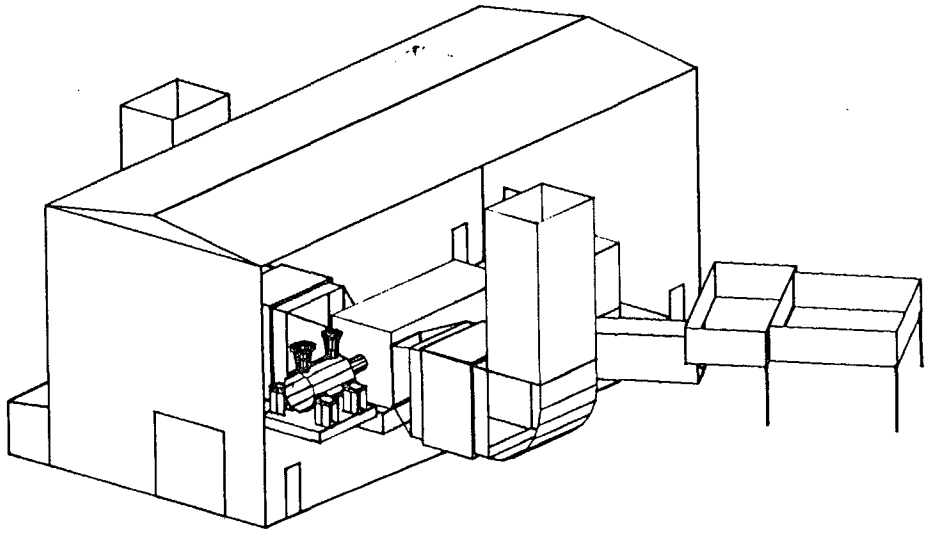
"It was secondhand, but brand new," Healy says.

The turbine will take natural gas from the "C" Plant discharge, compress it to a pressure of about 900 pounds per square inch and deliver 320 million cubic feet of gas to the nearby Conoco processing station.

When operating, the new Blanco Plant will be the most modern plant in the El Paso Natural system, according to Rick Benson, lead maintenance engineer, San Juan Division.

Benson said the total project, which includes the new "D" Plant and the installation of a new computerized control system in "C" Plant, will cost approximately $12 million and be completed by June 30.

The big turbine will be installed on a large concrete foundation at a site in the Blanco Plant area that has more stable soils than the old plant.



This is a computer-aided, three-dimensional drawing of the new Blanco "D" Plant.

Benson said the new plant will utilize two large regenerator units, which will provide it with a 25 percent improvement in fuel consumption over simple cycle turbines.

The turbine installation also will be more reliable and will require less maintenance than the old reciprocal units, he says, since it has a continuous combustion cycle and fewer moving parts.

The project was designed by San Juan, Southern and Main Office engineering departments. Project engineer was Don Bierd of Southern Division.

Echoes

(Continued from page 2)

Trish, who was born at Willcox Station says that throughout the system the houses were similar. Most had two bedrooms and one bath. They usually were built of shingle construction with tile floors.

The men at the stations kept everything in tiptop shape (EPNG field men can fix anything) and the grounds were lovely, she notes. Almost every camp was surrounded by large trees planted by the Company for shade, a windbreak and as a buffer from spring sandstorms.

While large families often were crowded, Trish says, "Most of us loved the life. The kids had perfect freedom and the parents didn't have to worry about them.

"We never locked our doors.

"I would have been happy to raise my kids in a Company camp."

Now, however, as you drive through the deserted streets of El Paso Station camp there is silence, broken only by the wind as it sighs through the trees and the empty homesites.

And, if in the twilight hours you think you hear ghostly voices . . . well, they are happy ghosts.

[16] Multistate assigned certain acreage to Bell & Kinley Company.
[17] Tenneco sold certain acreage effective December 1, 1986, to Vanguard Oil & Gas, Inc.
[18] Tenneco sold certain acreage to Unit Corporation.
[19] Effective 2-n-83, ARCO assigned its interest in certain acreage to Samedan Oil Corporation.
[20] By assignment dated 12-1-84; ARCO assigned its interest in certain acreage to Kelly Oil Company.
[21] By assignment effective 1-1-87, ARCO assigned its interest in certain acreage to Hondo Oil and Gas Company.
[22] Effective 1-1-87, ARCO assigned its interest in certain acreage to Hondo Oil and Gas Company.
[23] Sun assigned its interest in Property No. 808629, Berry E. Unit, to Pan Eastern Exploration Co. and Cabot Petroleum Corporation.
[24] Sun assigned its interest in Property No. 843020, Interstate E GU, to Cities Service Oil and Gas Corporation.
[25] Sun assigned its interest in Property No. 595175, Larkey Gas Unit "A", to Kaiser-Francis Oil Company.
[26] Sun assigned its interest in Property No. 693879, Smith "F" Unit, to Kaiser-Francis Oil Company.
[27] Sun assigned its interest in Property No. 662674, Ora Ramsey to Wellog Petroleum Corporation.
[28] No active leases remaining under Rate Schedule No. 98.
[29] Lone Star Gas Company's Katy Plant was permanently shut down on 11-21-86. Therefore, it is impossible for Lone Star to purchase the gas from the Gene Wood #1 Well under Contract dated 4-18-78. Edwards & Leach Oil Company proposes to sell this gas in intrastate commerce to Sohio Petroleum Company.
[30] By Assignment executed 3-2-87, retroactively effective 2-26-86, Conoco Inc. assigned unto Southern Resource Company, depths down to but not below 6,500 feet underlying an 80-acre tract out of the M. M. Garcia Survey 970, Abstract 1144 (a portion of Conoco Land Lease No. 23784).
[31] By Assignment of Oil and Gas Leases and Bill of Sale effective 4-1-87, Cities assigned its interest in the Dome "A" unit to G. L. Stafford, Jr.
[32] Effective 3-31-87, ARCO purchased all of British Borneo Petroleum Syndicate's interest in the Gillette Plant.
[33] Assignment of a part of Texaco Producing Inc.'s interest in certain acreage to Sirgo Brothers, Inc., and Timothy D. Collier.
[34] In addition, Applicant states, notice was received from El Paso to shut-in the affected well on January 17, 1987, and to this date, the well continues to be shut-in. Deliverability is approximately 46 Mcf/day. The gas is NGPA section 104 post-1974 gas.

Filing Code: A—Initial Service; B—Abandonment; C—Amendment to add acreage; D—Amendment to delete acreage; E—Total Succession; F—Partial Succession.

[FR Doc. 87-25090 Filed 10-28-87; 8:45 am]
BILLING CODE 6717-01-M

[Docket Nos. CP87-559-000 et al.]

Natural Gas Certificate Filings; El Paso Natural Gas Co. et al.

Take notice that the following filings have been made with the Commission:

1. El Paso Natural Gas Co.

[Docket No. CP87-559-000]

October 20, 1987

Take notice that on September 30, 1987, El Paso Natural Gas Company (El Paso), P.O. Box 1492, El Paso, Texas 79978, filed in Docket No. CP87-559-000 a request pursuant to § 157.205 of the Commission's Regulations under the Natural Gas Act (18 CFR 157.205) for authorization to construct and operate certain replacement field compression at El Paso's existing Blanco Field Plant located in San Juan County, New Mexico, all as more fully set forth in the application that is on file with the Commission and open to public inspection.

El Paso states that by orders issued June 19, 1952, June 29, 1953, November 25, 1955, December 19, 1956, March 26, 1958, April 15, 1963, June 10, 1969, and June 30, 1971, all as amended, at Docket Nos. G-1630, G-2106, G-8940, G-10499, G-11797, CP63-207, CP69-203, and CP71-214, respectively, El Paso received Commission authorization to construct and operate, *inter alia*, the Blanco Field Plant located in San Juan County, New Mexico. It is stated that the Blanco Field Plant consists of, *inter alia*, twenty-seven field compression units totaling 78,510 horsepower, and said horsepower was initially utilized by El Paso to compress a daily quantity of up to approximately 700 MMcf of natural gas received from various field sources situated behind the plant.

It is stated that the twenty-seven compressor units located at the Blanco Field Plant are segregated into the "A," "B," and "C" Plants. It is further stated that the "A" and "B" Plants can operate in parallel service, while the "C" Plant is located upstream and operates in series with the "A" and "B" Plants. El Paso advises that these plants are necessary to receive and compress quantities of natural gas from: (i) The Blanco Field: (ii) Ignacio dry gas to volumes; and (iii) volumes of gas from Gas Company of New Mexico ("GCNM"). It is stated that the two units at the "C" Plant, which total 44,560 horsepower, currently receive approximately 500 MMcf per day from the Blanco Field, and after compression at the "C" Plant, the gas stream splits, with approximately 320 MMcf per day discharged to the inlet of El Paso's "B" Plant and approximately 180 MMcf per day discharged directly to the inlet of the Conoco/Tenneco Deep Extraction Plant ("Conoco Plant").[1] It is further stated that the eleven units located at the "B" Plant, totalling 18,330 horsepower, currently compress up to 320 MMcf per day from the "C" Plant which volumes are also discharged directly to the Conoco Plant, and the fourteen units at the "A" Plant, which total 15,400 horsepower, currently receive, compress, and deliver to El Paso's mainline up to 141.5 MMcf per day received from the Ignacio dry gas source and GCNM.

El Paso states that periodic operational problems have occurred at the "B" Plant. It is explained that the primary cause of such problems has been directly attributed to the fact that the "B" Plant's foundation was constructed on an alluvial fill in an ancient river bed which river bed has proven over time to be an unstable and collapsing soil, and which when heavily loaded and unstabled by surface run-off or ground water, tends to shrink. El Paso advises that in the "B" Plant, as a consequence of the foundation's settling, a number of compressor crankshafts have failed, engine blocks have cracked, and plant piping has become stressed. It is stated that these facility problems, all of which are traceable to the foundation settling, [2] present continuing repair expenses and compressor unit down-time while repairs are made, in excess of the normal maintenance and repair experience for similar facilities of like age situated on El Paso's system. El Paso advises, for example, that in the last two and one-half years, three units at the "B" Plant have broken their crankshafts and each cost approximately $250,000 to repair. It is stated that the resultant down-time for two of the damaged compressor units at the "B" plant was a total of 242 days and Unit 8B, since its crankshaft failure in 1986, is still not back in service.

[1] The Conoco Plant was installed as a joint undertaking by Conoco Inc. and Tenneco Oil Company as a part of a special overriding royalty settlement. See FERC order issue June 26, 1985 at Docket No. CP74-314-014.

[2] A geotechnical review of past studies indicates that the soil in this river bed can collapse as much as ten percent of the total volume. There is presently up to ninety feet of this kind of soil beneath the "B" Plant, which in some areas has settled up to one foot.

El Paso states that it has concluded an alternative course of action for solution of the problem is preferrable. Such action would require El Paso to construct and operate another plant using a new gas turbine-driven centrifugal compressor located at another site within the Blanco Field Plant to replace and provide the compression service now offered by the "B" Plant. Specifically, El Paso proposes to construct and operate one new GE Frame 5 Model B gas turbine-driven centrifugal compressor, consisting of 31,050 ISO horsepower, within the existing Blanco Field Plant yard but at a more stable site. El Paso states that the proposed new compressor unit, hereinafter referred to as the "D" Plant, would provide a similar gas supply compression service to the service now provided by the existing "B" Plant compression and additionally would provide El Paso with the pressure-decline capability to move volumes from the Blanco Field during the next few years when the existing pressures are anticipated to drop below the operating range of the existing "C" Plant.

Comment date: December 4, 1987, in accordance with Standard Paragraph G at the end of this notice.

2. Arkla Energy Resources, a Division of Arkla, Inc.

[Docket No. CP87-547-000]

October 22, 1987.

Take notice that on September 21, 1987, Arkla Energy Resources, a division of Arkla, Inc. (AER), P.O. Box 21734, Shreveport, Louisiana 71151, filed in Docket No. CP87-547-000 an application pursuant to section 7 of the Natural Gas Act, for a certificate of public convenience and necessary authorizing the firm transportation of up to 150,000 MMBtu equivalent of natural gas per day, and the interruptible transportation of up to 150,000 MMBtu equivalent of natural gas per day on behalf of Vesta Energy Company and ESCO Exploration, Inc. (Shipper), all as more fully set forth in the application which is on file with the Commission and open to public inspection.

AER proposes to provide transportation in accordance with an agreement, as amended, between AER and Shipper (Agreement), which contemplates firm transportation by AER of up to 100,000 MMBtu per day in 1987 and up to 150,000 MMBtu per day thereafter. AER states that it would provide interruptible transportation of up to 150,000 MMBtu per day throughout the term of the Agreement. In this regard, AER states that it has agreed to receive natural gas from Shipper at specified points througout AER's transmission and gathering systems and would transport and deliver, for the account of Shipper, thermally equivalent volumes to various specified points of delivery on AER's transmission system. The Agreement is for a primary term ending July 1, 1995, and continues from year to year thereafter. For this service, AER proposes to charge Shipper rates that are the same as those approved by the Commission for partial requirements transportation service in Docket No. RP86-106-000.

AER states that the proposed service would serve the public convenience and necessity because it would provide AER an opportunity to increase its system load factor and thereby lower AER's unit costs and because it would stimulate the exploration for and development of reserves along AER's gathering and transmission system.

Comment date: November 16, 1987, in accordance with Standard Paragraph F at the end of this notice.

3. ANR Pipeline Co.

[Docket No. CP88-14-000]

October 22, 1987.

Take notice that on October 8, 1987,[3] ANR Pipeline Company (ANR), 500 Renaissance Center, Detroit, Michigan 48243, filed in Docket No. CP88-14-000 an application pursuant to section 7(c) of the Natural Gas Act for a certificate of public convenience and necessity authorizing ANR to provide natural gas sales service to Battle Creek Gas Company (BCGC) and to increase its natural gas sales service to Michigan Gas Utilities Company (MGU), and incident thereto to construct and operate certain facilities necessary to provide such service, all as more fully set forth in the application which is on file with the Commission and open to public inspection.

ANR proposes to provide firm sales service to BCGC, a new customer, of 4,700 dth of contract demand with an annual contract quantity of 1.7 million dth. ANR proposes to provide MGU, a current firm sales customer of ANR, an additional 12,500 dth of contract demand and an additional 3.2 million dth of annual contact quantity. It is stated that BCGC and MGU sales services will be rendered by ANR under its Rate Schedule CD-1.

ANR's application states that in order to accomplish the delivery of firm sales gas to both BCGC and MGU, ANR is requesting authorization to construct and operate 65.3 miles of natural gas pipeline and certain natural gas measurement facilities. These facilities estimated to cost 14.0 million extend north from ANR's existing mainline facilities in DeKalb County, Indiana to its terminus just south of the City of Battle Creek in Calhoun County, Michigan.

Comment date: November 16, 1987, in accordance with Standard Paragraph F at the end of this notice.

4. Columbia Gas Transmission Corp.

[Docket No. CP88-12-000]

October 22, 1987.

Take notice that on October 7, 1987, Columbia Gas Transmission Corporation (Columbia), 1700 MacCorkle Avenue, SE., Charleston, West Virginia 25314, filed in Docket No. CP88-12-000 an application pursuant to section 7(b) of the Natural Gas Act for permission and approval to abandon certain firm sales service to an existing wholesale customer, all as more fully set forth in the application which is on file with the Commission and open to public inspection.

Columbia states that two of its wholesale customers, T.W. Phillips Gas and Oil Company (Phillips) and Acme Natural Gas Company (Acme), have agreed to merge Acme into Phillips. Columbia states that in conjunction with the merger, Phillips and Acme have requested that Acme's currently effective contract demand level under Columbia's Rate Schedule CDS of 19,860 dt per day (exclusive of the first year Order 436[4] contract demand reductions of 3,182 dt per day and the exercise of the second year Order 436 reductions which may further reduce Acme's contract demand level to 13,496 dt per day effective November 1, 1987) be reduced to 4,750 dt per day on November 1, 1987, or the first day of the month following the effective date of the merger, whichever is later. The reduced contract demand for Acme of 4,750 dt per day plus the present contract demand of Phillips of 250 dt per day would result in a contract demand for Phillips of 5,000 dt per day under

[3] October 16, 1987, ANR filed a substitute application to change the estimated cost of its facilities and the mileage of pipeline to be constructed.

[4] Regulation of Natural Gas Pipelines After Partial Wellhead Decontrol, Order No. 436 [Reg. Preambles 1982-1985] FERC Stats. & Regs. Paragraph 30,665 (1985), *modified*, Order No. 436-A, [Reg. Preambles 1982-1985] FERC Stats. & Regs. Paragraph 30, 675 (1985), *modified further*, Order No. 436-B, III FERC Stats. & Regs. Paragraph 30,686 *reh'g denied*, Order No. 436-C, 34 FERC Paragraph 61,404, *reh'g denied*, Order No. 436-D, 34 FERC Paragraph 61,405, *reconsideration denied*, Order No. 436-E, 34 FERC Paragraph 61,403 (1986), *vacated and remanded, sub nom.*, Associated Gas Distributors v. FERC, No. 85-1811 (D.C. Cir June 23, 1987).

Dave Boyer

Do you have any interest in this?

UNITED STATES OF AMERICA

Before the

FEDERAL ENERGY REGULATORY COMMISSION

Request of
EL PASO NATURAL GAS COMPANY
at Docket No. CP87- 559-000

Pursuant to Section 157.205 of the
Federal Energy Regulatory Commission's
Regulations Under the Natural Gas Act

for
Authorization to

Construct and Operate Certain Replacement
Field Compression at the Blanco Field Plant
Located in San Juan County, New Mexico

Dated: September 29, 1987

Filed: September 30, 1987

UNITED STATES OF AMERICA

Before the

FEDERAL ENERGY REGULATORY COMMISSION

El Paso Natural Gas Company) Docket No. CP87-___

Request of El Paso Natural Gas Company for Authorization

EL PASO NATURAL GAS COMPANY, hereinafter referred to as "El Paso", hereby notifies the Federal Energy Regulatory Commission ("Commission"), 1/ pursuant to Section 157.205 of the Commission's Regulations Under the Natural Gas Act ("Act), of its request for authorization, under Section 157.208 of the Commission's Regulations, to construct and operate certain replacement field compression at El Paso's existing Blanco Field Plant located in San Juan County, New Mexico, as hereinafter more fully set forth.

In support hereof, El Paso respectfully states:

I.

The exact legal name of El Paso is El Paso Natural Gas Company. The name, title, mailing address and telephone number of those persons to whom correspondence and communications concerning this request are to be directed are as follows:

1/ As used herein, the term "Commission" refers to both the Federal Energy Regulatory Commission and its predecessor agency, the Federal Power Commission.

Mr. Charles R. Jack
Senior Vice President
El Paso Natural Gas Company
Post Office Box 1492
El Paso, Texas 79978
(915) 541-2600

Mr. Michael D. Moore
Director, Federal Agency Affairs
50 F Street, N.W.
Suite 1080
Washington, D.C. 20001
(202) 383-4960

El Paso received blanket certificate authorization at Docket No. CP82-435-000 (20 FERC ¶ 62,454 (1982)) for routine activities and abandonments of service and facilities, all as contemplated by Part 157, Subpart F, of the Commission's Regulations Under the Act.

II.

Background

By orders issued June 19, 1952, June 29, 1953, November 25, 1955, December 19, 1956, March 26, 1958, April 15, 1963, June 10, 1969, and June 30, 1971, all as amended, at Docket Nos. G-1630, G-2106, G-8940, G-10499, G-11797, CP63-207, CP69-203, and CP71-214, respectively, El Paso received Commission authorization to construct and operate, inter alia, the Blanco Field Plant located in San Juan County, New Mexico. 2/ The Blanco Field Plant consists of, inter alia, twenty-seven (27) field compression units totaling 78,510 horsepower. Said horsepower was initially utilized by El Paso to compress a daily quantity of up to approximately 700 MMcf of natural gas received from various field sources situated behind the plant.

2/ The location of the Blanco Field Plant is reflected on the geographical map attached at Tab 2.

Present Operations at the Blanco Field Plant

The twenty-seven (27) compressor units located at the Blanco Field Plant are segregated into the "A," "B," and "C" Plants. The "A" and "B" Plants can operate in parallel service, while the "C" Plant is located upstream and operates in series with the "A" and "B" Plants. These plants are necessary to receive and compress quantities of natural gas from: (i) the Blanco Field; (ii) Ignacio dry gas volumes; and (iii) volumes of gas from Gas Company of New Mexico ("GCNM"). The two (2) units at the "C" Plant, 3/ which total 44,560 horsepower, currently receive approximately 500 MMcf per day from the Blanco Field. After compression at the "C" Plant, the gas stream splits, with approximately 320 MMcf per day discharged to the inlet of El Paso's "B" Plant and approximately 180 MMcf per day discharged directly to the inlet of the Conoco/Tenneco Deep Extraction Plant ("Conoco Plant"). 4/ The eleven (11) units located at the "B" Plant, 5/ totaling 18,330 horsepower, currently compress up to 320 MMcf per day from the "C" Plant which volumes are also discharged directly to the Conoco Plant. The fourteen (14) units at the "A" Plant, 6/ which total 15,400 horsepower, currently

3/ The two (2) units at the "C" Plant were installed in 1970 and 1971, respectively.

4/ The Conoco Plant was installed as a joint undertaking by Conoco Inc. and Tenneco Oil Company as a part of a special overriding royalty settlement. See FERC order issued June 26, 1985 at Docket No. CP74-314-014.

5/ These units were installed at various times from 1956 to 1964.

6/ These units were installed in 1953 and 1954.

receive, compress, and deliver to El Paso's mainline up to 141.5 MMcf per day received from the Ignacio dry gas source and GCNM. 7/

At the "B" Plant, periodic operational problems have occurred. The primary cause of such problems have been directly attributed to the fact that the "B" Plant's foundation was constructed on an alluvial fill in an ancient river bed. This river bed has proven over time to be an unstable and collapsing soil, which when heavily loaded and wetted by surface run-off or ground water, tends to shrink. 8/ In the "B" Plant, as a consequence of the foundation's settling, a number of compressor crankshafts have failed, engine blocks have cracked, and plant piping has become stressed. These facility problems, all of which are traceable to the foundation settling, 9/ present continuing repair expenses and compressor unit down-time while repairs are made, in excess of the normal maintenance and repair experience for similar facilities of like age situated on El Paso's system. For example, in the last two and

---

7/ See the flow diagram attached at Tab 3 and designated Figure 1 of 2 reflecting the present operation of El Paso's Blanco Field Plant. In this regard, approximately 9,700 horsepower is shut-down at the "A" Plant and "B" Plant to meet the environmental requirements imposed by the State of New Mexico as a result of the construction of the Conoco Plant.

8/ The characteristics of the river bed were found to be more unstable than originally determined in 1956. Even with the utilization by El Paso of industry accepted construction techniques for the foundation of the "B" Plant, El Paso has continued to experience problems.

9/ A geotechnical review of past studies indicates that the soil in this river bed can collapse as much as ten percent (10%) of the total volume. There is presently up to ninety (90) feet of this kind of soil beneath the "B" Plant, which in some areas has settled up to one (1) foot.

one-half (2-1/2) years, three (3) units at the "B" Plant have broken their crankshafts. Each cost approximately $250,000 to repair. The resultant down-time for two (2) of the damaged compressor units at the "B" Plant was a total of 242 days. Unit 8B, since its crankshaft failure in 1986, is still not back in service.

El Paso has concluded an alternative course of action for solution of the problem is preferable. This action requires El Paso to construct and operate another plant using a new gas turbine-driven centrifugal compressor located at another site within the Blanco Field Plant to replace and provide the compression service now offered by the "B" Plant. Details of this proposal are set forth below.

Proposed Operations at the Blanco Field Plant

El Paso proposes to construct and operate one (1) new GE Frame 5 Model B gas turbine-driven centrifugal compressor, consisting of 31,050 ISO horsepower, within the existing Blanco Field Plant yard but at a more stable site. 10/ The proposed new compressor unit, hereinafter referred to as the "D" Plant, will provide a similar gas supply compression service to the service now provided by the existing "B" Plant compression. 11/ In addition to providing El Paso with the same compression service now performed by the "B" Plant, the new "D" Plant also will provide El Paso with the pressure-decline capability to move volumes from the Blanco Field during the next few years when existing

10/ The new compressor unit's foundation will be installed using present day foundation technology, similar to that used successfully by El Paso to construct the "C" Plant's foundation.

11/ See the flow diagram attached at Tab 3 and designated Figure 2 of 2.

reservoir pressures are anticipated to drop below the operating range of the existing "C" Plant. 12/

III.

The information required by Section 157.208(c) of the Commission's Regulations respecting the proposed construction and operation of the "D" Plant at the Blanco Field Plant is set forth below:

(1) The purpose of the proposed compression facilities and the relationship of the proposed compression facilities to El Paso's existing Blanco Field Plant is set forth in Section II hereof.

(2) A description of the proposed compression facilities to be constructed and operated by El Paso is set forth in Section V hereof.

(3) Attached at Tab 1 is a USGS map reflecting the location of the proposed compression facilities and the sensitive environmental areas within one quarter (¼) mile of the project area.

12/ El Paso will retain the "B" Plant in service until September 30, 1988. Thereafter, the units at the "B" Plant will be retired in place and cut loose from the existing station piping. El Paso will make the appropriate filing with the Commission to effectuate the abandonment of the "B" Plant.

(4) Attached at Tab 2 is a map reflecting the location of the proposed "D" Plant at the existing Blanco Field Plant and its relationship to El Paso's interstate natural gas transmission system.

(5) Attached at Tab 3 are an explanation and two (2) flow diagrams (designated Figures 1 of 2 and 2 of 2, and reflecting, respectively, the design day capacity before and after the construction and operation of the "D" Plant at the Blanco Field Plant). El Paso certifies that the compression facilities proposed to be constructed will be designed, installed, inspected, tested, operated, maintained, and, when necessary, replaced in accordance with Department of Transportation Safety Standards.

(6) Inasmuch as the instant request does not involve service to major new markets or major existing markets from new sources of gas over new routes, and further, since no new or additional sales of natural gas are proposed, these data are omitted.

(7) Attached at Tab 4 is an estimate of the cost of constructing the new compression facilities at the Blanco Field Plant. El Paso will finance the cost of the project through use of internally generated funds.

(8) Attached at Tab 5 is an explanation and a schedule setting forth the estimated incremental cost-of-service applicable to the proposed construction and operation of the "D" Plant at the Blanco Field Plant.

(9) A statement explaining how the public convenience and necessity requires the approval of the project is set forth in Section IV hereof.

(10)(i) and (ii)

Since no acquisition of facilities is proposed herein the data required by Sections 157.208(c)(10)(i) and (ii) are omitted.

(11) El Paso's analysis of the environmental issues respecting the proposed construction and operation of the "D" Plant at its Blanco Field Plant is attached at Tab 6.

IV.

Grant of the requested authorization for the proposed construction and operation of the replacement field compression at El Paso's existing Blanco Field Plant is required in order to permit El Paso to avoid: the development of a potentially unsafe operating situation; the costs associated with the stabilization of the foundation; repair expenses attributed to the settling of the foundation which damages both compressor units as well as pipeline; and the related

down-time when a unit is under repair. Absent grant of the requested authorization, El Paso would experience a potential safety hazard and the above operational problems and expenses. Additionally, the loss of two (2) or more units at the "B" Plant could seriously impact El Paso's ability to receive volumes of gas from the Blanco Field source and would affect El Paso's ability to meet its contractual obligations to supply natural gas at the Conoco Plant. For these reasons, El Paso believes that the requested authorization is required by and will serve the present and future public convenience and necessity.

V.

The field compression facilities proposed to be constructed and operated at the Blanco Field Plant are specifically described below:

Blanco Field Plant

Construction of the "D" Plant

One (1) 31,050 (ISO) horsepower GE Frame 5 Model B gas turbine-driven centrifugal compressor unit, with appurtenances, to be installed at El Paso's existing Blanco Field Plant located in Section 14, Township 29 North, Range 11 West, San Juan County, New Mexico.

The estimated total cost of the above described compression facilities including overhead and contingency is $10,892,500. Details of such cost are submitted herewith at Tab 4.

VI.

El Paso believes and therefore states that no filing to supplement or effectuate the instant request must be or is to be filed

by El Paso, or any other person, with any Federal, state or other regulatory body.

VII.

Appended hereto is a statement in conformity with Section 157.205(b)(5) of the Commission's Regulations suitable for publication in the Federal Register, summarizing the instant request.

VIII.

WHEREFORE, El Paso Natural Gas Company respectfully requests that authorization to construct and operate certain replacement field compression at the existing Blanco Field Plant located in San Juan County, New Mexico, be granted in accordance with the prior notice procedures prescribed by Section 157.205 of the Commission's Regulations.

Respectfully submitted,

EL PASO NATURAL GAS COMPANY

By _____
John M. Craig
Vice President

Donald J. MacIver, Jr.
Senior Vice President,
General Counsel and Secretary
Richard Owen Baish
Vice President,
Associate General Counsel
and Assistant Secretary
Dennis J. Dwyer
El Paso Natural Gas Company
Post Office Box 1492
El Paso, Texas 79978

Richard C. Green
Hogan & Hartson
555 13th Street, N.W.
Washington, D.C. 20004
(202) 637-5600

Counsel for
EL PASO NATURAL GAS COMPANY

Dated: September 29, 1987

STATE OF TEXAS)
)
COUNTY OF EL PASO)

JOHN M. CRAIG, being first duly sworn, on oath, says that he is a Vice President of El Paso Natural Gas Company, that he has read the within and foregoing Request of El Paso Natural Gas Company for Authorization and that he is familiar with the contents thereof; that, as such Officer, he has executed the same for and on behalf of said Company with full power and authority to do so; and that the matters and facts set forth therein are true to the best of his information, knowledge and belief; and that the activities proposed in said Request comply with the requirements of Part 157, Subpart F, of the Federal Energy Regulatory Commission's Regulations Under the Natural Gas Act.

John M. Craig

SUBSCRIBED AND SWORN TO before me, the undersigned authority, on this 29th day of September, 1987.

Emmie M. Gardea
Notary Public in and for
the State of Texas
My Commission Expires June 22, 1988

UNITED STATES OF AMERICA

Before the

FEDERAL ENERGY REGULATORY COMMISSION

El Paso Natural Gas Company) Docket No. CP87-____

NOTICE OF REQUEST FOR AUTHORIZATION

(October, 1987)

Take notice that on September , 1987, El Paso Natural Gas Company ("El Paso"), a Delaware corporation, whose mailing address is Post Office Box 1492, El Paso, Texas, 79978, filed a request for authorization at Docket No. CP87-____, pursuant to Section 157.205 of the Federal Energy Regulatory Commission's ("Commission") Regulations Under the Natural Gas Act ("Act"), to construct and operate certain replacement field compression at El Paso's existing Blanco Field Plant located in San Juan County, New Mexico, all as more fully set forth in the request for authorization on file with the Commission and open for public inspection.

The request for authorization states that by orders issued June 19, 1952, June 29, 1953, November 25, 1955, December 19, 1956, March 26, 1958, April 15, 1963, June 10, 1969, and June 30, 1971, all as amended, at Docket Nos. G-1630, G-2106, G-8940, G-10499, G-11797, CP63-207, CP69-203, and CP71-214, respectively, El Paso received Commission authorization to construct and operate, inter alia, the Blanco Field Plant located in San Juan County, New Mexico. The Blanco Field Plant consists of, inter alia, twenty-seven (27) field compression units totaling 78,510 horsepower. Said horsepower was initially utilized by El Paso to compress a daily quantity of up to approximately 700 MMcf of natural gas received from various field sources situated behind the plant.

The request for authorization further states that the twenty-seven (27) compressor units located at the Blanco Field Plant are segregated into the "A," "B," and "C" Plants. The "A" and "B" Plants can operate in parallel service, while the "C" Plant is located upstream and operates in series with the "A" and "B" Plants. These plants are necessary to receive and compress quantities of natural gas from: (i) the Blanco Field; (ii) Ignacio dry gas volumes; and (iii) volumes of gas from Gas Company of New Mexico ("GCNM"). The two (2) units at the "C" Plant, which total 44,560 horsepower, currently receive approximately 500 MMcf per day from the Blanco Field. After compression at the "C" Plant, the gas stream splits, with approximately 320 MMcf per day discharged to the inlet of El Paso's "B" Plant and approximately 180 MMcf per day discharged directly to the inlet of the Conoco/Tenneco Deep

Extraction Plant ("Conoco Plant"). 1/ The eleven (11) units located at the "B" Plant, totaling 18,330 horsepower, currently compress up to 320 MMcf per day from the "C" Plant which volumes are also discharged directly to the Conoco Plant. The fourteen (14) units at the "A" Plant, which total 15,400 horsepower, currently receive, compress, and deliver to El Paso's mainline up to 141.5 MMcf per day received from the Ignacio dry gas source and GCNM.

At the "B" Plant, periodic operational problems have occurred. The primary cause of such problems have been directly attributed to the fact that the "B" Plant's foundation was constructed on an alluvial fill in an ancient river bed. This river bed has proven over time to be an unstable and collapsing soil, which when heavily loaded and wetted by surface run-off or ground water, tends to shrink. In the "B" Plant, as a consequence of the foundation's settling, a number of compressor crankshafts have failed, engine blocks have cracked, and plant piping has become stressed. These facility problems, all of which are traceable to the foundation settling, 2/ present continuing repair expenses and compressor unit down-time while repairs are made, in excess of the normal maintenance and repair experience for similar facilities of like age situated on El Paso's system. For example, in the last two and one-half (2-1/2) years, three (3) units at the "B" Plant have broken their crankshafts. Each cost approximately $250,000 to repair. The resultant down-time for two (2) of the damaged compressor units at the "B" Plant was a total of 242 days. Unit 8B, since its crankshaft failure in 1986, is still not back in service.

El Paso has concluded an alternative course of action for solution of the problem is preferable. This action requires El Paso to construct and operate another plant using a new gas turbine-driven centrifugal compressor located at another site within the Blanco Field Plant to replace and provide the compression service now offered by the "B" Plant. Specifically, El Paso proposes to construct and operate one (1) new GE Frame 5 Model B gas turbine-driven centrifugal compressor, consisting of 31,050 ISO horsepower, within the existing Blanco Field Plant yard but at a more stable site. The proposed new compressor unit, hereinafter referred to as the "D" Plant, will provide a similar gas supply compression service to the service now provided by the existing "B" Plant compression. In addition to providing El Paso with the same compression service now performed by the "B" Plant, the new "D" Plant also will provide El Paso with the pressure-decline capability to move volumes from the Blanco Field during the next few years when

---

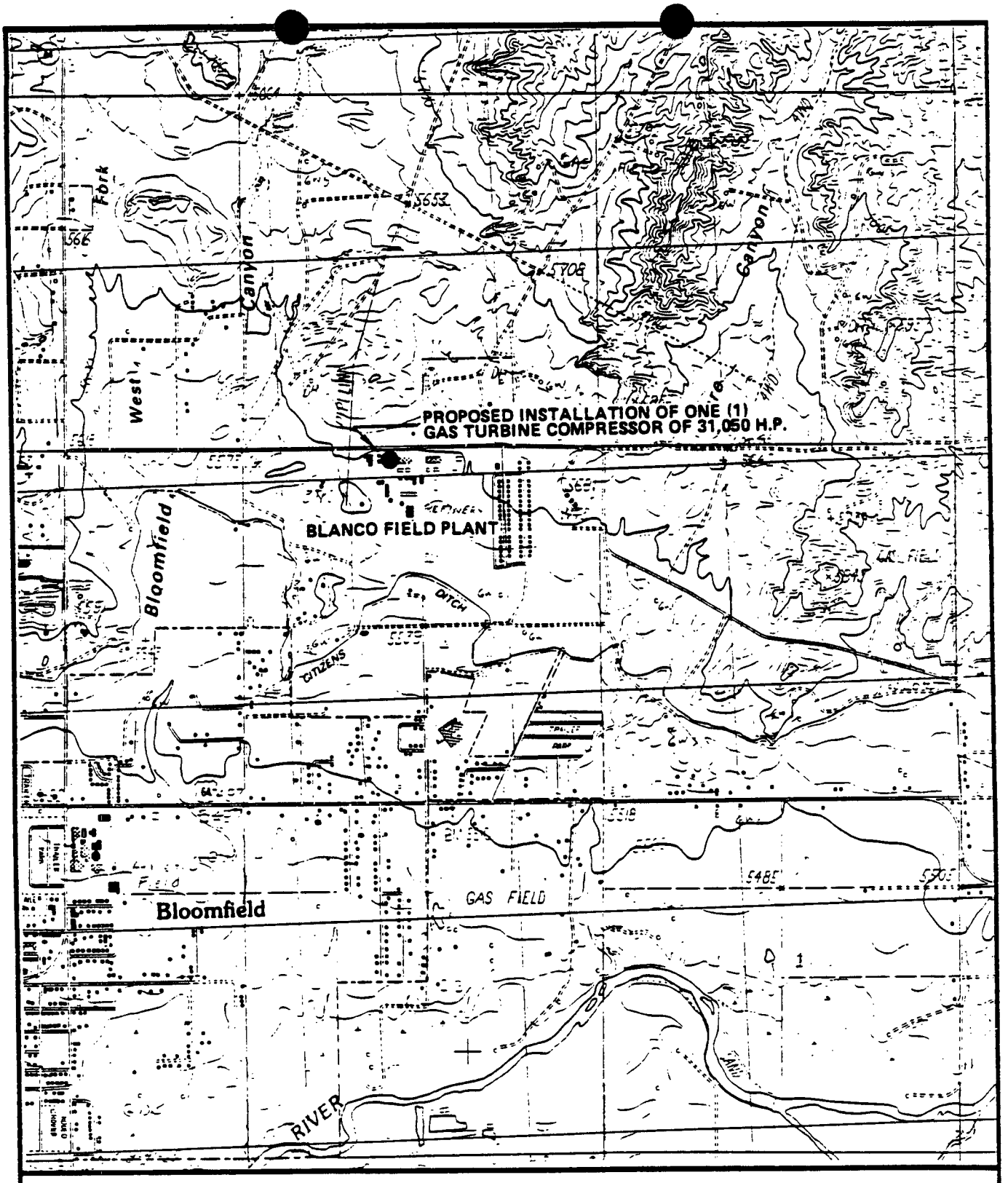
1/ The Conoco Plant was installed as a joint undertaking by Conoco Inc. and Tenneco Oil Company as a part of a special overriding royalty settlement. See FERC order issued June 26, 1985 at Docket No. CP74-314-014.

2/ A geotechnical review of past studies indicates that the soil in this river bed can collapse as much as ten percent (10%) of the total volume. There is presently up to ninety (90) feet of this kind of soil beneath the "B" Plant, which in some areas has settled up to one (1) foot.

existing reservoir pressures are anticipated to drop below the operating range of the existing "C" Plant.

Any person or the Commission's Staft may, within 45 days after issuance of the instant notice by the Commission, file pursuant to Rule 214 of the Commission's Procedural Rules (18 CFR 385.214) a motion to intervene or notice of intervention and pursuant to Section 157.205 of the Regulations Under the Natural Gas Act (18 CFR 157.205) a protest to the request. If no protest is filed within the time allowed therefor, the proposed activity shall be deemed to be authorized effective the day after the time allowed for filing a protest. If a protest is filed and not withdrawn within 30 days after the time allowed for filing a protest, the instant request shall be treated as an application for authorization pursuant to Section 7 of the Natural Gas Act.

Kenneth F. Plumb,
Secretary



0 1000 2000 3000

SCALE IN FEET

REFERENCE:

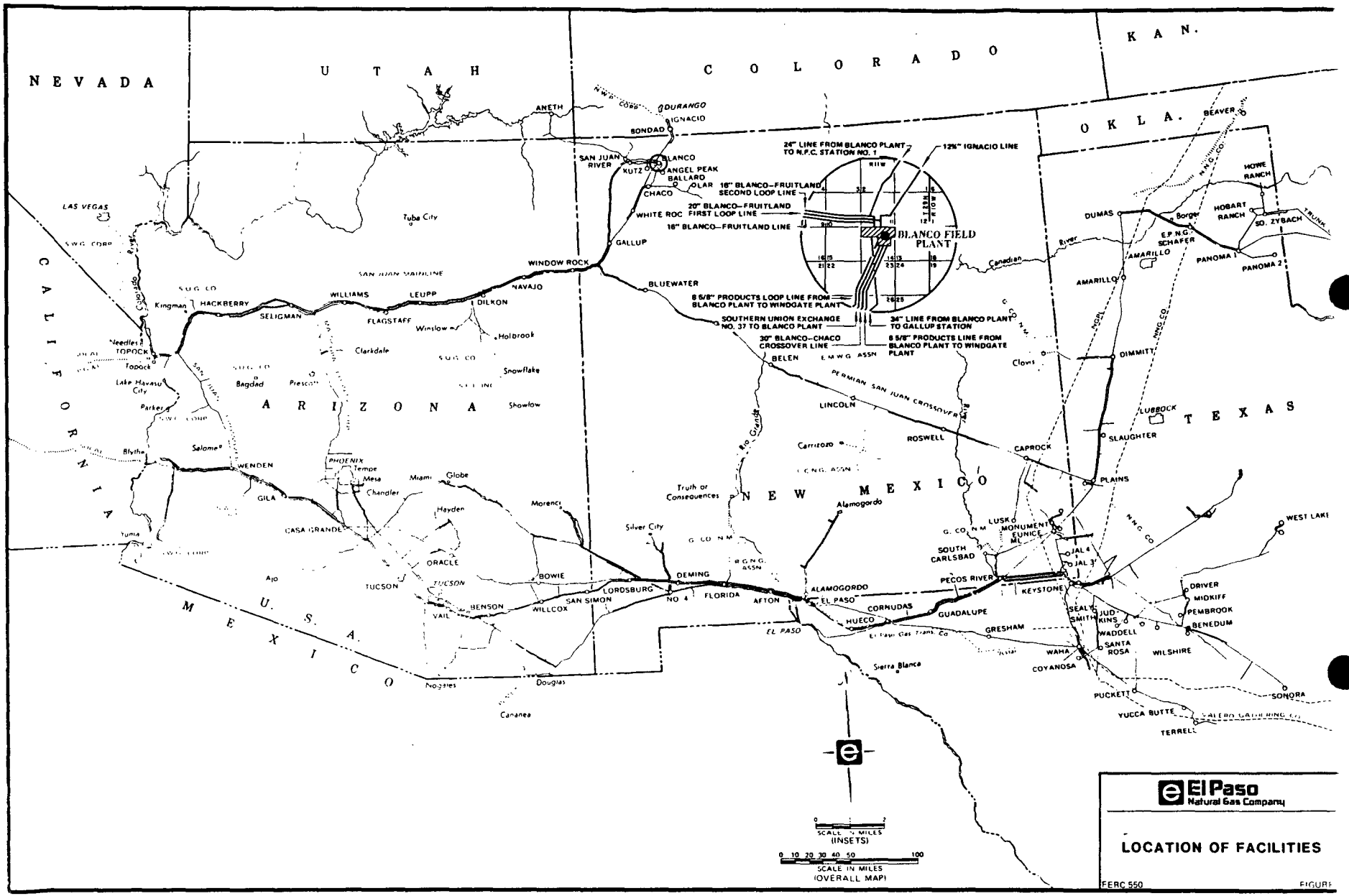
BLOOMFIELD QUADRANGLE
NEW MEXICO–SAN JUAN CO.
7.5 MINUTE SERIES (TOPOGRAPHIC)

El Paso
Natural Gas Company

**PROPOSED INSTALLATION IN THE
BLANCO FIELD PLANT ONE
(1) 31,050 H.P. GAS TURBINE COMPRESSOR**

Section 14, T–29–N, R–11–W
San Juan County, New Mexico

GS–277


NEVADA
U T A H
C O L O R A D O
K A N.
OKLA.
TEXAS
A R I Z O N A
N E W M E X I C O
CALIFORNIA
M E X I C O
U. S. A.
LAS VEGAS
Tuba City
ANETH
DURANGO
IGNACIO
BONDAD
SAN JUAN RIVER
BLANCO
KUTZ
ANGEL PEAK
BALLARD
OLAR
CHACO
WHITE ROC
GALLUP
WINDOW ROCK
NAVAJO
DILKON
LEUPP
FLAGSTAFF
WILLIAMS
SELIGMAN
HACKBERRY
Kingman
TOPOCK
Needles
Topock
Lake Havasu City
Parker
Blythe
Yuma
Wenden
Salome
Bagdad
Prescott
Clarkdale
Winslow
Holbrook
Snowflake
Showlow
PHOENIX
Tempe
Mesa
Chandler
GILA
CASA GRANDE
ORACLE
TUCSON
Ajo
Nogales
Douglas
Cananea
Miami
Globe
Hayden
Morenci
Silver City
Truth or Consequences
Carrizozo
Alamogordo
LINCOLN
BELEN
BLUEWATER
ROSWELL
CAPROCK
PLAINS
SLAUGHTER
LUBBOCK
Clovis
DIMMITT
AMARILLO
DUMAS
Borger
BEAVER
HOWE RANCH
HOBART RANCH
SO. ZYBACH
PANOMA 1
PANOMA 2
E.P.N.G. SCHAFER
Canadian River
WEST LAKE
DRIVER
MIDKIFF
PEMBROOK
BENEDUM
WILSHIRE
SONORA
PUCKETT
YUCCA BUTTE
TERRELL
SEALY SMITH
JUDKINS
WADDELL
SANTA ROSA
WAHA
COYANOSA
KEYSTONE
JAL 4
JAL 3
LUSK
MONUMENT
EUNICE
SOUTH CARLSBAD
PECOS RIVER
GRESHAM
GUADALUPE
CORNUDAS
HUECO
EL PASO
AFTON
FLORIDA
NO 4
DEMING
LORDSBURG
SAN SIMON
WILLCOX
BOWIE
TUCSON
VAIL
BENSON
Sierra Blanca
24" LINE FROM BLANCO PLANT TO N.P.C. STATION NO. 1
12¾" IGNACIO LINE
16" BLANCO–FRUITLAND SECOND LOOP LINE
20" BLANCO–FRUITLAND FIRST LOOP LINE
16" BLANCO–FRUITLAND LINE
BLANCO FIELD PLANT
8 5/8" PRODUCTS LOOP LINE FROM BLANCO PLANT TO WINDGATE PLANT
SOUTHERN UNION EXCHANGE NO. 37 TO BLANCO PLANT
20" BLANCO–CHACO CROSSOVER LINE
34" LINE FROM BLANCO PLANT TO GALLUP STATION
8 5/8" PRODUCTS LINE FROM BLANCO PLANT TO WINDGATE PLANT
SAN JUAN MAINLINE
PERMIAN SAN JUAN CROSSOVER
EMWG ASSN
EPNG ASSN
SCALE IN MILES (INSETS)
SCALE IN MILES (OVERALL MAP)
El Paso Natural Gas Company
LOCATION OF FACILITIES
FERC 550
FIGURE

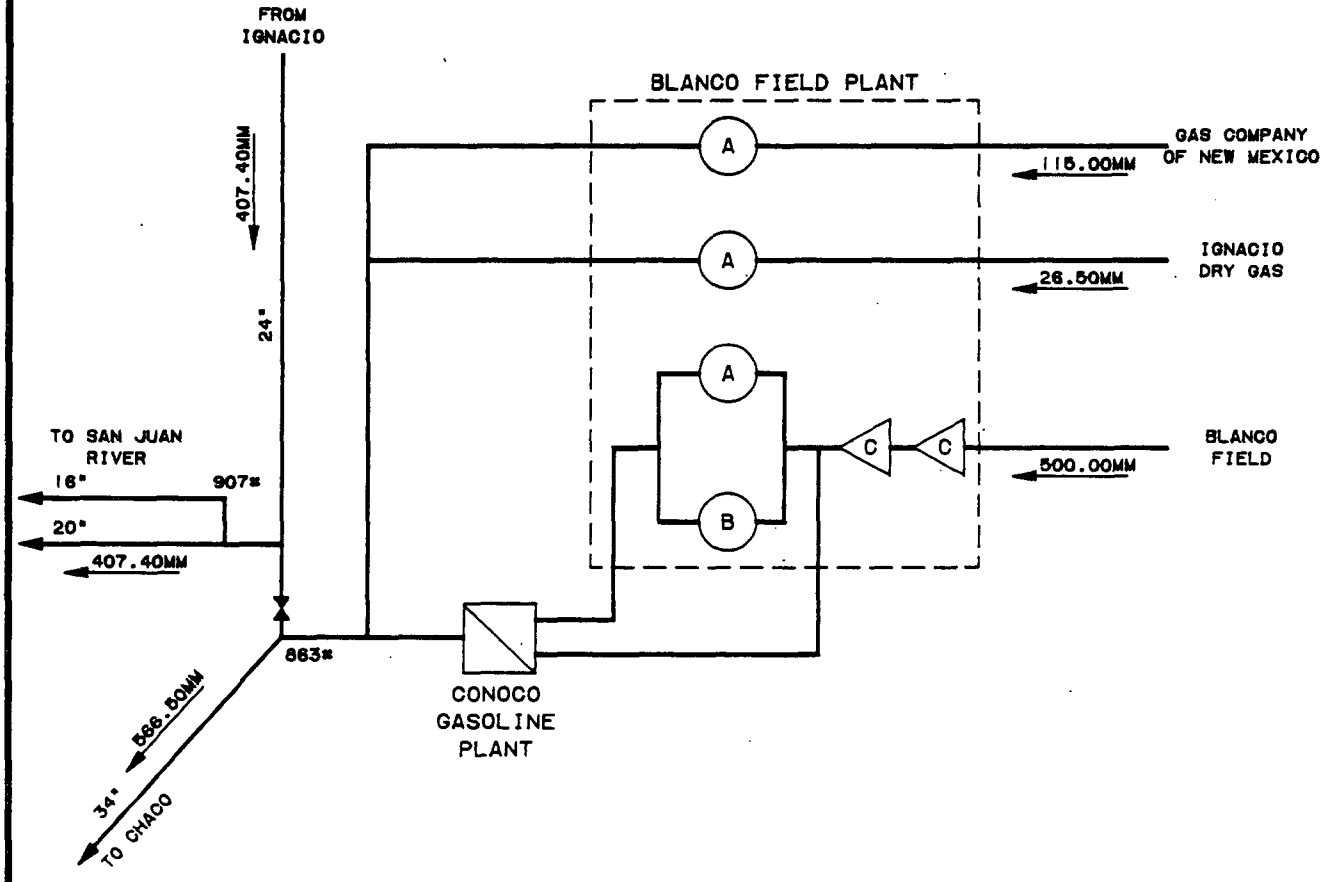
Construction of Replacement Compression
at the Blanco Field Plant
Explanation of Flow Diagrams

Tab 3 consists of two (2) flow diagrams designated Figure 1 of 2 and Figure 2 of 2. Figure 1 of 2 shows the daily design capacity operation of El Paso's existing Blanco Field Plant before the proposed construction and operation of the "D" Plant.

Figure 2 of 2 shows the daily design capacity operation of El Paso's Blanco Field Plant after the proposed construction and operation of the "D" Plant. El Paso's existing facilities are shown in black and the proposed construction described in this notification is shown in red.

Both flow diagrams show the source, direction and volume of gas flow, pipeline operating pressures, pipe size and complete compressor station operating data.

STATION NAME	BLANCO FIELD PLANT				
	A PLANT			B PLANT	C PLANT
	G.C.N.M.	IGN.D.G.	FIELD		
SUCTION PRESSURE, psia	493	290	427	427	175
DISCHARGE PRESSURE, psia	868	878	922	922	437
COMPRESSION RATIO	1.761	3.028	2.159	2.159	2.497
SUCTION TEMPERATURE, °F	60	60	90	90	60
BHP/MMCF	31.65	66.80	47.57	47.57	59.46
MMCF TO COMPRESS	115.0	26.5	0.0	320.0	500.0
BRAKE HORSEPOWER	3640	1825	0	15,222	29,730
ELEVATION IN FEET	5600	5600	5600	5600	5600
CORRECTION FACTOR	0.830	0.830	0.830	0.957	0.727
SEA LEVEL HORSEPOWER	4385	2200	0	15,912	40,883
STANDARD HORSEPOWER	4400	2200	0	15,930	44,560
SPARE HORSEPOWER	0	0	8800	2400	0
TOTAL HORSEPOWER	4400	2200	8800	18,330	44,560
INSTALLED HORSEPOWER	15,400			18,330	44,560
PROPOSED HORSEPOWER	0			0	0
MMCF COMPRESSOR FUEL	0.82	0.41	0	2.97	8.19



LEGEND

- EPNG CO PIPELINE
- EPNG CO RECIPROCATING COMPRESSOR UNIT
- EPNG CO GAS TURBINE COMPRESSOR UNIT
- OTHER COMPANIES' PLANT
- # PRESSURES ARE SHOWN IN PSIA

NOTE:
ALL VOLUMES AT 14.73 psia & 60°F

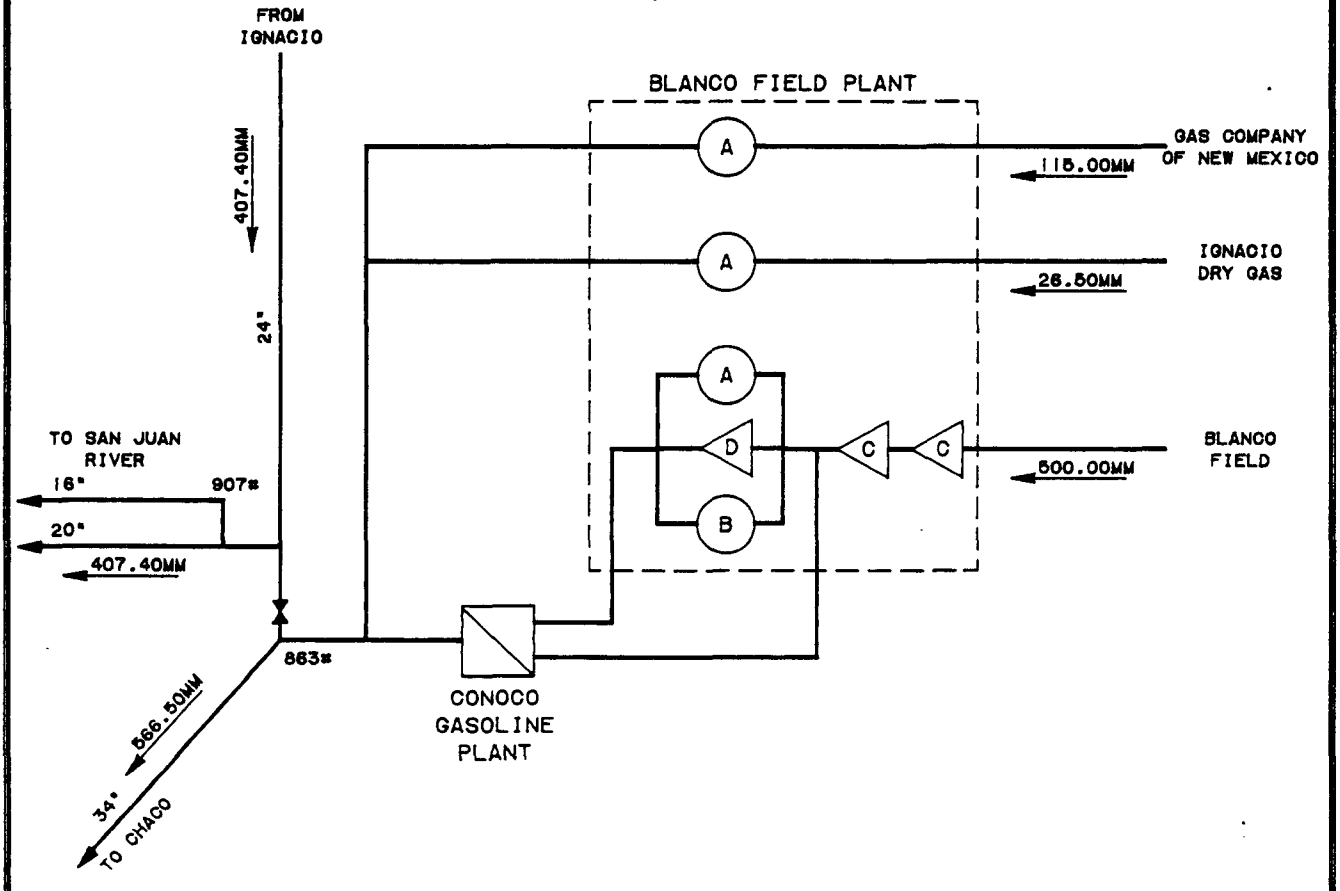
El Paso NATURAL GAS COMPANY

FLOW DIAGRAM SHOWING DAILY DESIGN CAPACITY OPERATION BEFORE PROPOSED FACILITY REPLACEMENT

FERC548 FIGURE 1 OF 2

FER88

STATION NAME	BLANCO FIELD PLANT					
	A PLANT			B PLANT	C PLANT	D PLANT
	G.C.N.M.	IGN.D.G.	FIELD			
SUCTION PRESSURE, psia	493	290	427	427	175	427
DISCHARGE PRESSURE, psia	868	878	922	922	437	922
COMPRESSION RATIO	1.761	3.028	2.159	2.159	2.497	2.159
SUCTION TEMPERATURE, °F	60	60	90	90	60	90
BHP/MMCF	31.85	68.80	47.57	47.57	59.48	50.90
MMCF TO COMPRESS	115.0	26.5	0.0	0.0	500.0	320.0
BRAKE HORSEPOWER	3640	1825	0	0	29,730	16,288
ELEVATION IN FEET	5600	5600	5600	5600	5600	5600
CORRECTION FACTOR	0.830	0.830	0.830	0.957	0.727	0.737
SEA LEVEL HORSEPOWER	4385	2200	0	0	40,883	22,101
STANDARD HORSEPOWER	4400	2200	0	0	44,560	31,050
SPARE HORSEPOWER	0	0	8800	18,330	0	0
TOTAL HORSEPOWER	4400	2200	8800	18,330	44,560	31,050
INSTALLED HORSEPOWER	15,400			18,330	44,560	0
PROPOSED HORSEPOWER	0	0	0	0	0	31,050
MMCF COMPRESSOR FUEL	0.82	0.41	0	0	8.19	3.69



LEGEND

- EPNG CO PIPELINE
- EPNG CO RECIPROCATING COMPRESSOR UNIT
- EPNG CO GAS TURBINE COMPRESSOR UNIT
- EPNG CO PROPOSED COMPRESSOR UNIT
- OTHER COMPANIES' PLANT
- # PRESSURES ARE SHOWN IN PSIA

NOTE:
ALL VOLUMES AT 14.73 psia & 60°F

El Paso NATURAL GAS COMPANY

FLOW DIAGRAM SHOWING DAILY DESIGN CAPACITY OPERATION AFTER PROPOSED FACILITY REPLACEMENT

FERC549 FIGURE 2 OF 2

FER89

EL PASO NATURAL GAS COMPANY

Cost of Facilities

Blanco D Plant

Install One (1) 31,050 HP (ISO) Gas Turbine Driven Centrifugal Compressor Unit and Necessary Appurtenances

Site Improvements	$ 59,000
Material	
Compressor Building	$ 160,000
Control Building	40,000
Foundations	70,000
Compressor Unit - 31,050 HP (ISO)	3,538,000
Accessory Equipment	172,000
Piping	550,000
Electrical	200,000
Instruments and Controls	346,000
Other	336,000
Total Material	$ 5,412,000
Installation Cost	
Company	$ 225,000
Contractor	3,334,000
Total Installation Cost	$ 3,559,000
Other Field Cost	
General Construction Cost	$ 871,000
Total Direct Cost	$ 9,901,000
Add: Overhead @ 5%	495,000
Contingency @ 5%	495,000
Filing Fee	1,500
Total Cost	$10,892,500

EL PASO NATURAL GAS COMPANY

Revenues - Expenses - Income

Explanation of Exhibit N

This exhibit reflects the estimated incremental cost of service for the first three (3) full years of operation attributable solely to the proposed facilities to be constructed and operated by El Paso Natural Gas Company ("El Paso").

The estimated costs set forth on Schedule 1 of this exhibit reflect the cost to El Paso to construct and operate certain replacement compressor facilities, with appurtenances at the Blanco Field Plant.

The operation and maintenance, and taxes other then income taxes, shown on lines 1 and 2, respectively, are based on El Paso's experience. Depreciation expense, indicated on line 3, was computed at the rate of 1.60% as is presently being applied to the transmission system pursuant to El Paso's Stipulation and Agreement at Docket No. RP85-58.

The return shown on line 4, was computed by applying 14.27% to the rate base reflected on line 17. Federal income tax was computed on the basis of the current federal tax rate after deduction of interest expense.

The rate base investment, shown on Schedule 1, consists of average balances of the proposed additional gas plant investment described at Tab 4 (Exhibit K) to the prior notice request, related accumulated provision for depreciation, working capital and accumulated provision for deferred income tax. Working capital indicated on line 12 was computed on the basis of El Paso's historical experience.

7/WCC2

EL PASO NATURAL GAS COMPANY

PRO-FORMA COST OF SERVICE

Blanco D Plant

Line No.	Description (a)	Year 1 (b)	Year 2 (c)	Year 3 (d)	Source or Basis of Estimate (e)	Line No.
	Cost of Service					
1	Operation and Maintenance	$897,934	$938,341	$985,258	Based on Experience	1
2	Taxes Other than Income Taxes	125,264	125,264	125,264	1.15% x Line 7	2
3	Depreciation and Amortization	174,280	174,280	174,280	1.60% x Line 7	3
4	Return	1,561,255	1,501,059	1,433,936	14.27% x Line 17	4
5	Income Taxes	642,765	618,050	590,489	1/	5
6	Total Cost of Service	$3,401,498	$3,356,994	$3,309,227		6
	Rate Base					
7	Total Depreciable Plant	$10,892,500	$10,892,500	$10,892,500	Refer to Exhibit K	7
	Less: Reserve for Depreciation					
8	Beginning Balance	$0	$174,280	$348,560		8
9	Ending Balance	174,280	348,560	522,840		9
10	Average Balance	$87,140	$261,420	$435,700		10
11	Net Plant	$10,805,360	$10,631,080	$10,456,800		11
12	Working Capital	$225,475	$225,475	$225,475	2.07% of Gross Plant	12
13	Subtotal	$11,030,835	$10,856,555	$10,682,275		13
	Less: Accumulated Deferred Income Taxes 2/					
14	Beginning Balance	$0	$180,023	$495,115		14
15	Ending Balance	180,023	495,115	772,229		15
16	Average Balance	$90,012	$337,569	$633,672		16
17	Rate Base	$10,940,823	$10,518,986	$10,048,603		17
	1/ Income Tax Computation					
18	Return	$1,561,255	$1,501,059	$1,433,936	Line 4	18
19	Less: Interest Expense	503,278	483,873	462,236		19
20	Taxable Return	$1,057,977	$1,017,186	$971,700		20
21	Amortization of Equity AFUDC	2,851	2,851	2,851		21
22	Tax Base	$1,060,828	$1,020,037	$974,551		22
	Income Tax Computation					
23	Federal	$546,487	$525,474	$502,041	34%/66% or 51.5151% of Line 22	23
24	State	96,278	92,576	88,448	5.99% of Lines 22 + 23	24
25	Total	$642,765	$618,050	$590,489		25
	2/ Provision for Deferred Income Tax					
26	Deferred Federal Income Tax	$153,064	$267,906	$235,616	15 Year ACRS	26
27	Deferred State Income Tax	26,959	47,186	41,498		27
28	Total Deferred Income Taxes	$180,023	$315,092	$277,114		28

BLANCO FIELD PLANT COMPRESSOR UNIT ADDITION

STATEMENT CONCERNING THE REQUIREMENTS OF THE NATIONAL ENVIRONMENTAL POLICY ACT OF 1969

(i) Environmental Conditions

The project area is in the San Juan Basin of northwest New Mexico. Blanco Plant, where the proposed new compressor unit will be installed, is located approximately 1.5 miles north of the San Juan River and 0.25 miles northeast of the town of Bloomfield at an elevation of 5,600 feet (see map at Tab 1). El Paso operates the Blanco Field Plant under an air quality permit (No. 613) the New Mexico Environmental Improvement Division issued on May 6, 1985.

The biotic community characteristic of the project area is Great Basin Desertscrub (Brown and Lowe 1980, Brown 1982). Big sagebrush, fourwing saltbush, rabbitbrush and Mormontea predominate on land north of the plant. To the south, in the San Juan River Valley, the land is highly modified by agriculture and urban development. The project site itself is within the Blanco Field Plant yard and is entirely devoid of vegetation. The soil at the project site is of the Stumble-Fruitland association, which consists of deep, well-drained loamy sands and sandy loams formed in alluvium (Keetch 1980).

El Paso is aware of no sensitive environmental areas within 0.25 miles of the project site. Potential habitat for the candidate endangered plant Aztec gilia (Gilia formosa) is present approximately 0.5 miles north of the site (Bureau of Land Management 1987). Prime farmland is present 0.5 miles to the southeast (U.S. Soil Conservation Service 1982). There are numerous archeological sites in this portion of the San Juan Basin, many expected to be eligible for listing on the National Register of Historic Places (Bureau of Land Management 1987); however, no sites are present within the Blanco Field Plant yard, where all project activities will take place.

(ii) Environmental Impacts

Ground disturbance during installation of the proposed new compressor unit will cause no significant environmental impacts. The unit will be installed on an 0.23-acre site entirely within the Blanco Field Plant property. All of the land to be disturbed during construction has been previously disturbed and is kept cleared of vegetation as part of El Paso's normal plant maintenance activities. No sensitive environmental areas will be affected by project construction. The project will have no impacts on cultural resources or endangered species.

Once operating, the proposed unit will be a new source of air emissions at the plant, but its emissions will be offset by reduced emissions due to retirement of the existing compressor units at the "B" Plant.

As a result, El Paso anticipates that emissions from the proposed new configuration of the Blanco Field Plant will not exceed the maximum allowed under the current air quality permit for the plant. For similar reasons, there should be no significant change in overall noise levels at the plant.

(iii) Consultation

The project will take place on previously disturbed land entirely within an existing facility. El Paso's environmental review for the project indicated no potential for impacts to cultural resources or endangered species. Therefore, under terms of letter agreements El Paso has with the New Mexico State Historic Preservation Officer (Merlan 1984) and the U.S. Fish and Wildlife Service (Peterson 1984), no direct consultations for this project were necessary.

No consultations were needed regarding compliance with the Coastal Zone Management Act; New Mexico has no coastal zone.

(iv) Conclusion

Given the above considerations, authorization of the proposed new compressor unit will not be a major federal action significantly affecting the quality of the human environment.

(v) References

Brown, D. E. (ed). 1982. Biotic communities of the American Southwest - United States and Mexico. In: Desert Plants 4(1-4):1-342/

Brown, D. E., and C. H. Lowe. 1980 Biotic communities of the Southwest. Gen. Tech. Rpt. RM-78. Rocky Mtn. Forest and Range Expt. Sta., U.S. Dept. Agr., Forest Service. (Map).

Bureau of Land Management. 1987. Draft Farmington resource management plan and environmental impact statement. Farmington Resource Area, Albuquerque District, BLM, U.S. Dept. Interior, Farmington, NM.

Keetch, C. W. 1980. Soil survey of San Juan County, New Mexico, eastern part. Soil Conserv. Serv., U.S. Dept. Agr. 173 pp + maps.

Merlan, T. W. 1984. Letter to J. A. Sproul dated October 22, 1984. SHPO, Historic Preservation Division, New Mexico Office of Cultural Affairs, Santa Fe.

Peterson, J. C. 1984. Letter to J. A. Sproul dated November 21, 1984. Field Supervisor, Ecological Services, USFWS, Albuquerque, NM.

U.S. Soil Conservation Service. 1982. Important farmlands, San Juan County, New Mexico. SCS, U.S. Dept. Agr., Aztec, NM. (map).

El Paso
Natural Gas Company

P O BOX 4990
FARMINGTON, NEW MEXICO 87499
PHONE 505-325-2841

May 4, 1987

Mr. David G. Boyer
Hydrogeologist/Environmental Bureau Chief
Energy and Minerals Department
Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87501-2088

Subject: Centralized Disposal or Collection Pit Registration Form

Dear Mr. Boyer:

Enclosed are Registration forms and construction drawings for lined surface impoundments to be installed at El Paso's Blanco, Chaco and Lindrith Plants. Please feel free to contact me if you require additional information or clarification.

Sincerely Yours,

Kenneth R. Beasley III
Compliance Engineer

KEB:cm

Enclosures

STATE OF NEW MEXICO

ENERGY AND MINERALS DEPARTMENT

OIL CONSERVATION DIVISION

BARREY CARRUTHERS
GOVERNOR

May 14, 1987

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

Mr. Kenneth Beasley III
Compliance Engineer
El Paso Natural Gas Co.
P.O. Box 4990
Farmington, NM 87499

RE: Centralized Disposal Impoundments

Dear Mr. Beasley:

We have received and evaluated the pit registration forms and construction design drawings you submitted for the proposed lined pits at your Blanco, Chaco and Lindrith Plants. The pits are to accept primarily produced fluids from those fields identified in the pit registration forms. The fluids generated at the gas processing plants that will be disposed of in these pits must be identified in the individual plant's discharge plan. If a discharge plan is not currently in force at the plant, then the streams must be identified in the discharge plan application when one is requested.

The design and specifications are adequate for the protection of ground water and are approved with the following provisions:

1) An adequate freeboard will be maintained at all times to prevent over-topping of the side walls.

2) Monthly inspections of the leak detection system will be performed. If fluids are detected in the leak detection sump, notification will be made to this office, samples taken and analyzed and prompt repairs made on the primary liner if required.

Please be advised that this approval does not relieve you of liability should your operation result in actual pollution of surface or ground waters which may be actionable under other laws and/or regulations.

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

Sincerely,

Roger Anderson
Environmental Engineer

xc OCD-Aztec

State of New Mexico
Energy and Minerals Department

OIL CONSERVATION DIVISION
P. O. Box 2088
Santa Fe, New Mexico 87501
(505) 827-5800

CENTRALIZED DISPOSAL OR COLLECTION
PIT REGISTRATION FORM

Owner/Operator: EL PASO NATURAL GAS
(List information only for pits operated by you at a lease or at other locations)

Address: P.O. Box 4990, Farmington, New Mexico 87499

Well and Lease, or Facility Name: BLANCO PLANT

Location: Bloomfield, New Mexico SW1/4 SE1/4 Section 11, T-29-N, R-11-W, San Juan Co., N.M.

(A) Pit Fluid Sources	(B) Pit Fluid Type: 1. Produced Water 2. Completion Fluids 3. Drilling Fluids 4. Drill Cuttings	(C) Maximum Daily Discharge to each Pit	(D) Pit Type: 1. Unlined 2. Lined 3. Tank
List all Wells & Locations that Contribute Fluid to Pit			
1. Blanco Plant SW1/4 SE1/4 Section 11, T-29-N, R-11-W			
a) Drip storage, water phase	P.W.	160 Bbl.E	Lined
b) Steam rack drain	P.W.	20 Bbl.E	
c) F-1 field storage tank drain	P.W.	20 Bbl.E	
2. Kutz Field T-29N thru 32N, R-8W-thru 13W			
a) Drip storage, water phase	P.W.	40 Bbl.E	
b) Miscellaneous line drips	P.W.	20 Bbl.E	
3. Blanco Field T-26N thru 31N, R-3W thru 11W			
a) Miscellaneous line drips	P.W.	20 Bbl.E	

Is this facility located in or within 100 horizontal feet of a watercourse? Yes _____ No X

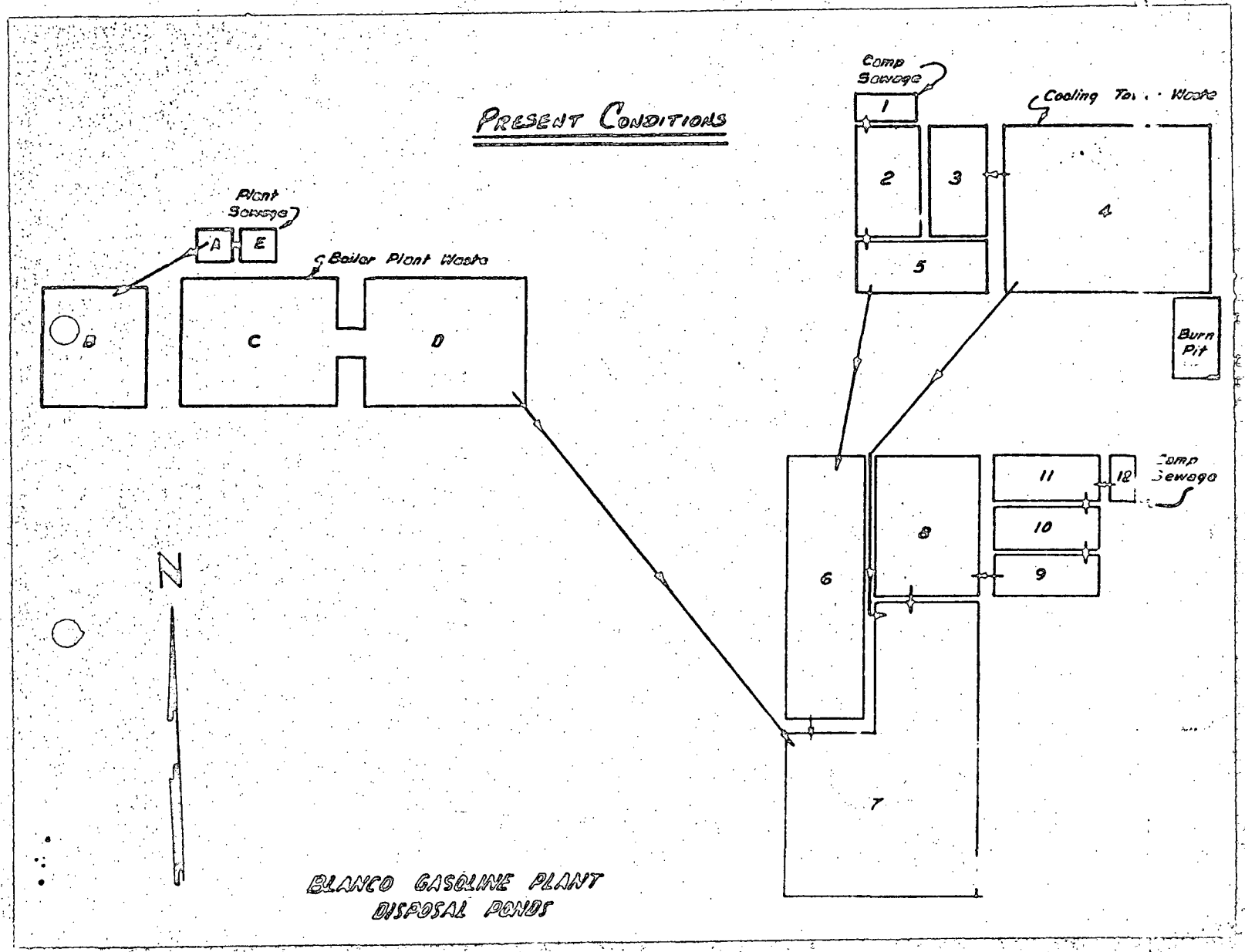
Watercourse: Any lake-bed or gully, draw, stream bed, wash, arroyo, or natural or man-made channel through which water flows or has flowed.

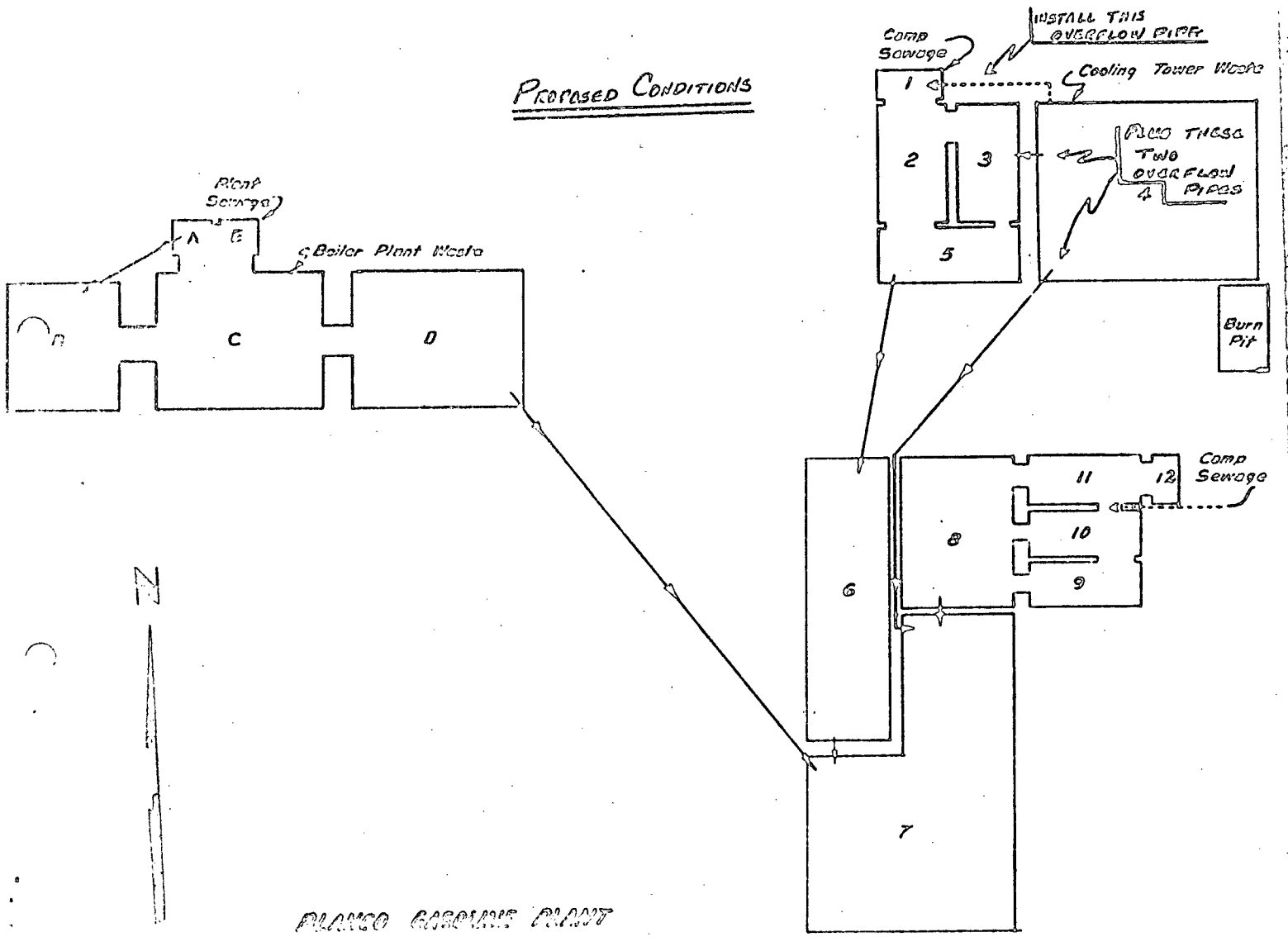
Is ground water at the site at 10 feet or less from the base of the pit? Yes _____ No X

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

(Signature) — MAY 4, 1987 (Date)

KENNETH E. BEASLEY III (Printed Name of Person Signing) — COMPLIANCE ENGINEER (Title)


PRESENT CONDITIONS
Camp Sewage
1
Cooling Tow. Waste
2
3
4
5
Burn Pit
Plant Sewage
A
E
Boiler Plant Waste
B
C
D
6
8
11
12
Camp Sewage
10
9
7
N
BLANCO GASOLINE PLANT
DISPOSAL PONDS


PROPOSED CONDITIONS
INSTALL THIS OVERFLOW PIPE
Comp Sewage
Cooling Tower Waste
1
2
3
4
5
PLUG THESE TWO OVERFLOW PIPES
Burn Pit
Plant Sewage
A
B
Boiler Plant Waste
n
C
D
6
7
8
9
10
11
12
Comp Sewage
N
PLANCO GASOLINE PLANT
PROPOSED POWER

State of New Mexico
Energy and Minerals Department

OIL CONSERVATION DIVISION
P. O. Box 2088
Santa Fe, New Mexico 87501
(505) 827-5800

CENTRALIZED DISPOSAL OR COLLECTION
PIT REGISTRATION FORM

Owner/Operator: EL PASO NATURAL GAS
(List information only for pits operated by you at a lease or at other locations)

Address: P.O. Box 4990, Farmington, New Mexico 87499

Well and Lease, or Facility Name: BLANCO PLANT

Location: Bloomfield, New Mexico SW1/4 SE1/4 Section 11, T-29-N, R-11-W, San Juan Co., N.M.

(A) Pit Fluid Sources	(B) Pit Fluid Type: 1. Produced Water 2. Completion Fluids 3. Drilling Fluids 4. Drill Cuttings	(C) Maximum Daily Discharge to each Pit	(D) Pit Type: 1. Unlined 2. Lined 3. Tank
List all Wells & Locations that Contribute Fluid to Pit			
1. Blanco Plant SW1/4 SE1/4 Section 11, T-29-N, R-11-W			
a) Drip storage, water phase	P.W.	160 Bbl.E	Lined
b) Steam rack drain	P.W.	20 Bbl.E	
c) F-1 field storage tank drain	P.W.	20 Bbl.E	
2. Kutz Field T-29N thru 32N, R-8W-thru 13W			
a) Drip storage, water phase	P.W.	40 Bbl.E	
b) Miscellaneous line drips	P.W.	20 Bbl.E	
3. Blanco Field T-26N thru 31N, R-3W thru 11W			
a) Miscellaneous line drips	P.W.	20 Bbl.E	

Is this facility located in or within 100 horizontal feet of a watercourse? Yes_____ No X
Watercourse: Any lake-bed or gully, draw, stream bed, wash, arroyo, or natural or man-made channel through which water flows or has flowed.

Is ground water at the site at 10 feet or less from the base of the pit? Yes_____ No X

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

(Signature) — MAY 4, 1987 (Date)

KENNETH E. BEASLEY III (Printed Name of Person Signing) — COMPLIANCE ENGINEER (Title)

El Paso
Natural Gas Company

P. O. BOX 4990
FARMINGTON, NEW MEXICO 87499
PHONE: 505-325-2841

February 5, 1987

Mr. David Duran
Stationary Sources Section
Air Quality Bureau
New Mexico Health and Environment Department
Santa Fe, New Mexico 87504-0968

Subject: NMEID January 27, 1987 Correspondence Regarding Flaring at El Paso Natural Gas Blanco Plant.

Dear Mr. Duran:

This letter acknowledges receipt on January 29, 1987 of your letter dated January 27, 1987. Your letter indicates that an NMEID representative observed open burning of petroleum liquids on January 26, 1987 in an open flare pit at El Paso's Blanco Plant. The following summary describes the operations being conducted and responds to questions posed in that letter regarding the smoke emission.

Pigging of field lines was being conducted to remove liquids which had collected in the lines. This is a normal procedure and is carried out to prevent an accumulation of liquids which would restrict gas flow. This procedure is conducted more frequently in the winter than in the warmer months since the lower temperatures cause an increase in the amount of liquids which fall out of the gas due to condensation. The amount of liquids which are currently accumulating has been increased considerably because of well-known market problems being experienced by the industry. These problems are obviously beyond El Paso's control.

Existing components within the plant are designed to handle the liquids as they are pushed ahead of the pig. However, when abnormal conditions exist, there must be a means to keep any liquids from entering the compressor suction where they would cause equipment damage and possibly a fire or explosion.

On January 26 certain conditions existed which necessitated flaring liquids in conjunction with the above-described pigging procedure. Extremely low temperatures had caused a very large accumulation of liquids and some ice as well. Normal unloading of those plant components handling liquids was hampered by a low field pressure coupled with a high pressure in the line which serves as the vapor recovery system for pigging operations. This slowed the rate at which liquids could be transferred to storage and purging to the flare system was required to prevent freezing of the line to the storage tanks and carryover of liquids to the

plant's compressors. The liquids which were routed to the flare system at the plant were a combination of water and hydrocarbons. It should be noted here that approximately 110 barrels of liquid were flared yet over 1000 barrels were routed to storage during the pigging operations. This serves to illustrate that it is definitely El Paso's preference and continued intention to collect these liquids. There is a definite economic incentive to do so. Flaring is considered a means to control an abnormal, potentially hazardous situation and certainly is not the preferred disposition of these liquids. However, the only alternative to flaring at this installation is to allow these liquids to carry over and cause a high-level plant shutdown. This type of event is expensive and potentially dangerous. Thus the situation was handled as expeditiously as possible giving due consideration to the potential hazards to safety.

El Paso Natural Gas remains committed to complying with the many provisions of the New Mexico Air Quality Control Act. It is likewise El Paso's intention to continue to study its pigging operations and, as always, avoid flaring when at all possible through proper operating techniques and equipment maintenance. Should abnormal situations such as those which are presently occurring dictate a necessity to flare liquids, El Paso will make every effort to minimize the duration and frequency to ensure that emissions are kept at the lowest possible level. Pigging procedures are being reviewed in order to avoid accumulations beyond planned volumes.

Although El Paso feels that the practice described above is allowable under AQCR 301.B.2 in the interest of safety, consideration will be given to seeking permission in the form of permit applications under AQCR 301.F until other alternatives can be identified. Finally, it should be noted that the flare pit from which the smoke emanated is a part of the emissions inventory previously submitted to the agency by El Paso.

Because of the short response time to your letter, all data required for a discussion with you on the subject of flaring is not immediately available. We are continuing to gather that information. El Paso would welcome an opportunity to meet with the Bureau on the subject as soon as practicable and respectfully requests that a meeting be scheduled so that available information can be provided and reviewed and further information requirements, if any, identified. Please feel free to contact this office at (505)-325-2841 Extension 2175 should you require further information or clarification on this matter.

Sincerely yours,

Kenneth E. Beasley III
Compliance Engineer

NEW MEXICO
HEALTH AND ENVIRONMENT
DEPARTMENT

Post Office Box 968
Santa Fe, New Mexico 87504-0968

GARREY CARRUTHERS
Governor

LARRY GORDON
Secretary

CARLA L. MUTH
Deputy Secretary

January 27, 1987

CERTIFIED MAIL P 176 062 004
RETURN RECEIPT REQUESTED

Ken Beesley
El Paso Natural Gas Co.
P.O. Box 990
Farmington, New Mexico 87401

NOTICE OF VIOLATION

Dear Mr. Beesley:

On January 26, 1987, a representative from the Division's Farmington Field Office observed open burning of petroleum liquids at your Blanco Plant near Bloomfield, New Mexico. The fire was observed from an open pit that was approximately 20 to 40 feet in diameter which generated large quantities of black smoke.

On the basis of this observation, the Bureau has determined that El Paso Natural Gas Company was open burning in violation of Air Quality Control Regulation (AQCR) 301 - Regulation to Control Open Burning. Section A of the regulation states that "Except as otherwise provided in this regulation,no person shall cause suffer or allow open burning." Open burning of liquid petroleum products is not exempted from the regulation and the burning of such liquids at the Blanco facility was not specifically permitted under Section F of the regulation.

The Air Quality Control Act authorizes the District Court to issue an injunction and to impose a civil penalty of up to $1,000.00 per day for violation the Act or of a regulation adopted under the Act.

Within ten (10) days of your receipt of this letter, please provide this office with a written response identifying the steps you have taken or plan to take to prevent future violations of AQCR 301. In order to evaluate the extent of the open burning, please include in your response a full description of the liquid petroleum products burned on January 26, 1987 and an estimate of the total quantity.

If you wish to challenge the Bureau's initial findings or to discuss a settlement of this case, please contact Cubia L. Clayton, Chief, Air Quality Bureau at (505) 827-0042, within 10 days of receipt of this letter. The

scheduling of a meeting does not preclude the necessity for providing the written response indicated in this letter.

Sincerely,

J. David Duran
Stationary Sources Section

JDD/md

xc: Louis Rose, Deputy Chief General Counsel, HED
David Tomco, Program Manager, Farmington EID Office
Barbara Hargis, Program Manager, Stationary Sources Section
Cubia L. Clayton, Chief, Air Quality Bureau

CERTIFIED/RETURN RECEIPT REQUESTED

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 gathring 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."

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,

V.E. Deerhart 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 8-30-88

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 by 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
- ☐ Former
- ☐ State or Local Gov't
- ☐ Federal Gov't (GSA facility I.D. no. _____)
- ☒ Private or Corporate
- ☐ Ownership uncertain

II. LOCATION OF TANK(S)

(If same as Section 1, mark box here ☐)

Facility Name or Company Site Identifier, as applicable
Blanco Field Plant

Street Address or State Road, as applicable
1 1/2 mi E of Bloomfield; 3/4 mi N SH 17

County
San Juan

City (nearest): Bloomfield | State: NM | ZIP Code: 87499

Indicate number of tanks at this location: 2

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	Signature	Date Signed
John C. Bridges	John C Bridges	5/3/86

CONTINUE ON REVERSE SIDE

* See Attached Sheet pg 3 of 3

VI. DESCRIPTION OF UNDERGROUND STORAGE TANKS (Complete for each tank at this location.)

ank Identification No. (e.g., ABC-123), or rbitrarily Assigned Sequential Number (e.g., 1,2,3...)		Tank No. 5200-1 *	Tank No. 5200-2 *	Tank No.	Tank No.	Tank No.
. Status of Tank (Mark all that apply ☒)	Currently in Use	X	X			
	Temporarily Out of Use					
	Permanently Out of Use					
	Brought into Use after 5/8/86					
. Estimated Age (Years)		30	33			
. Estimated Total Capacity (Gallons)		400	400			
. Material of Construction (Mark one ☒)	Steel					
	Concrete	X	X			
	Fiberglass Reinforced Plastic					
	Unknown					
	Other, Please Specify					
. Internal Protection (Mark all that apply ☒)	Cathodic Protection					
	Interior Lining (e.g., epoxy resins)					
	None	X	X			
	Unknown					
	Other, Please Specify					
. External Protection (Mark all that apply ☒)	Cathodic Protection					
	Painted (e.g., asphaltic)					
	Fiberglass Reinforced Plastic Coated					
	None	X	X			
	Unknown					
	Other, Please Specify					
. Piping (Mark all that apply ☒)	Bare Steel	X	X			
	Galvanized Steel					
	Fiberglass Reinforced Plastic					
	Cathodically Protected					
	Unknown					
	Other, Please Specify					
. Substance Currently or Last Stored in Greatest Quantity by Volume (Mark all that apply ☒)	a. Empty					
	b. Petroleum					
	Diesel					
	Kerosene					
	Gasoline (including alcohol blends)					
	Used Oil	X	X			
	Other, Please Specify					
	c. Hazardous Substance					
Please Indicate Name of Principal CERCLA Substance						
OR Chemical Abstract Service (CAS) No.						
Mark box ☒ if tank stores a mixture of substances						
	d. Unknown					
. Additional Information (for tanks permanently taken out of service)						
a. Estimated date last used (mo/yr)		/	/	/	/	/
b. Estimated quantity of substance remaining (gal.)						
c. Mark box ☒ if tank was filled with inert material (e.g., sand, concrete)						

* See Attached Sheet pg 3 of 3

Blanco Field Plant

*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.

El Paso NATURAL GAS COMPANY

P. O. BOX 990
FARMINGTON, NEW MEXICO 87401
PHONE: 505-325-2841

August 9, 1985

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

Dear Phil

Enclosed you will find the water analyses you requested during your visit on August 6, 1985. To show the nature of the water in the ponds, a sample was secured near the inlet and outlet of each pond. These samples are grab samples secured near the surface of the ponds.

If you require any further information please let me know.

Sincerely

Gregory C. Kardos

EL PASO NATURAL GAS COMPANY
Gregory C. Kardos
Chief Division Chemist

GCK/bp

cc: J. L. Williams
K. E. Beasley
W. F. Lorang
J. W. Somerhalder
File

EL PASO NATURAL GAS COMPANY
SAN JUAN DIVISION LABORATORY
FARMINGTON, NEW MEXICO
PROCESS WATER ANALYSIS

SAMPLE NAME: BLANCO COOLING POND - SE CORNER ANALYSIS NO.: 2-11664
DATE SECURED: AUGUST 7, 1985 SECURED BY: J. P. BARNETT

COMPONENT	SAMPLE SIZE	ml. TIT	AS CaCO3	AS ION	epm
pH				8.6	
TOTAL ALKALINITY	50	4.3	86		
P ALKALINITY	50	.2	4		
BICARBONATE	50	3.9	78	95	1.56
CARBONATE	50	.4	8	5	0.16
HYDROXIDE	50	0	0	0	0.00
CHLORIDE	50	2.6		52	1.47
SULFATE				334	6.95
TOTAL HARDNESS	50	17	340		
CALCIUM	50	13.3	266	106	5.32
MAGNESIUM	50	3.7	74	18	1.49
IRON				ABSENT	
SODIUM (by ATOMIC ABSORPTION)				63	2.74
CHROMIUM AS CrO4				NT	
SULFITE AS SO3				NT	
PHOSPHATE AS PO4				NT	
TOTAL DISSOLVED SOLIDS				688	
CONDUCTIVITY AT 25C.				950 MICROMHOS	

ALL RESULTS EXPRESSED AS PARTS PER MILLION-TRACE IS LESS THAN 0.1 ppm

cc:
J. L. WILLIAMS
J. K. THORNTON
W. F. LORANG
G. C. KARDOS
PHIL BACA - NMOCD
FILE

SANDRA ARAGON
CHEMIST GCK

GCK-11/83

EL PASO NATURAL GAS COMPANY
SAN JUAN DIVISION LABORATORY
FARMINGTON, NEW MEXICO
PROCESS WATER ANALYSIS

SAMPLE NAME: BLANCO COOLING POND - NEAR INLET ANALYSIS NO.: 2-11665
DATE SECURED: AUGUST 7, 1985 SECURED BY: J. P. BARNETT

COMPONENT	SAMPLE SIZE	ml. TIT	AS CaCO3	AS ION	epm
pH				8.7	
TOTAL ALKALINITY	50	4.3	86		
P ALKALINITY	50	.3	6		
BICARBONATE	50	3.7	74	90	1.48
CARBONATE	50	.6	12	7	0.24
HYDROXIDE	50	0	0	0	0.00
CHLORIDE	50	1		20	0.56
SULFATE				336	6.99
TOTAL HARDNESS	50	17	340		
CALCIUM	50	13.6	272	109	5.44
MAGNESIUM	50	3.4	68	17	1.37
IRON				ABSENT	
SODIUM (by ATOMIC ABSORPTION)				60	2.61
CHROMIUM AS CrO4				NT	
SULFITE AS SO3				NT	
PHOSPHATE AS PO4				NT	
TOTAL DISSOLVED SOLIDS				662	
CONDUCTIVITY AT 25C.				950 MICROMHOS	

ALL RESULTS EXPRESSED AS PARTS PER MILLION-TRACE IS LESS THAN 0.1 ppm

cc:
J. L. WILLIAMS
J. K. THORNTON
W. F. LORANG
G. C. KARDOS
PHIL BACA - NMOCD
FILE

SANDRA ARAGON
CHEMIST GCK

GCK-11/83

Sec 14 T11N -

Date: 8-6-85
Plant Visit: EPNG Blanco (N. of Bloomfield)
Operation: Gas Plant (500 MMCF/day Capacity)

Wastewater Effluent Sources:
- Cooling Tower
- Boiler
- API Separator
- Process Vessels

Water goes to classifier then to Bloomfield sewer plant. City allows max. of
Pict. # 18 & # 19

Solid waste to EPNG owned landfill.

Concrete storm water collection
Solid adsorbent from dehydrators on roads

Boiler Blowdown to unlined pit before classifier for temp control (Will send us cation anion analysis)

API Separator collects from closed drain system mostly process vessels

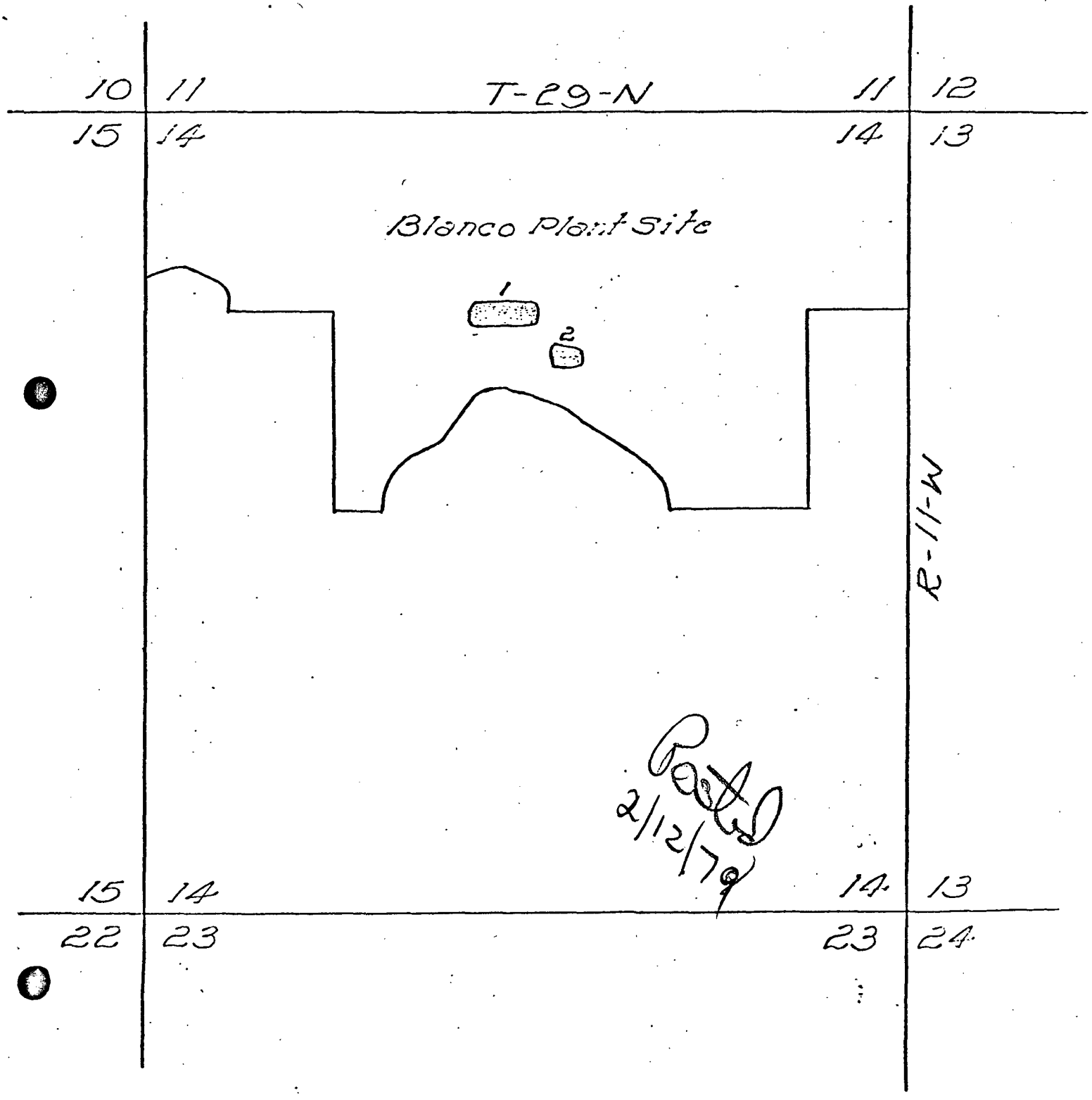
Storm water goes to oil water separation sump

Picture 15 is cooling pond
" 16 is sump

Two flare pits in operation
One shutdown

SPCC pond collects water from major storms Picture #17. (Unlined)

1. 350' x 130' x 3'
2. 300' x 150' x 3'



Posted
2/12/79

BLANCO PLANT

These pits are for cooling purposes only. After cooling, all effluent enters the Bloomfield municipal waste water system.

Annual volume to pits - 8,550,000 gallons.

These ponds are unlined.

(5-52)

EL PASO NATURAL GAS COMPANY
SAN JUAN DIVISION LABORATORY

WATER ANALYSIS

BLANCO DISPOSAL POND

Secured 1-2-79

ANALYSIS NUMBER: 2-9443

pH	7.9
Total hardness as $CaCO_3$	134
Calcium as $CaCO_3$	124
Magnesium as $CaCO_3$	10
P Alkalinity as $CaCO_3$	0
Total Alkalinity as $CaCO_3$	90
Claride as Cl	14
Sulfate as SO_4	160
Silica as SiO_2	
Iron as Fe	
Total Solids	352
Sodium as Na calculated	65
Conductivity @ 25°C	600
Phosphate	1

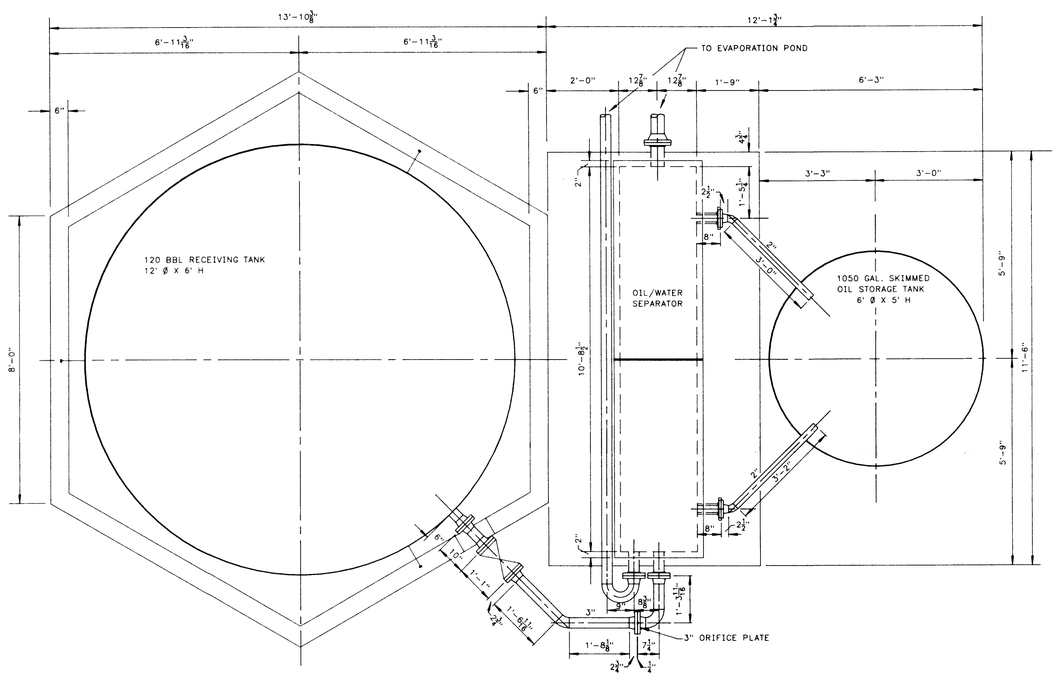
--all results expressed as parts per million --- trace is less than 0.1 ppm --

REMARKS:

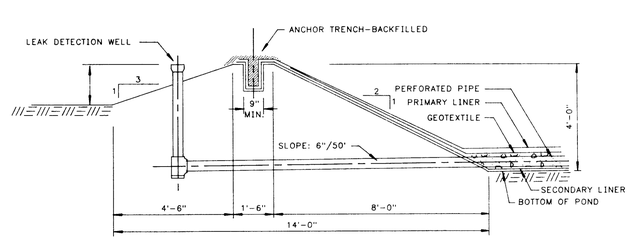
cc: D. O. Vilven
file + 2

Joe Barnett
Chemist

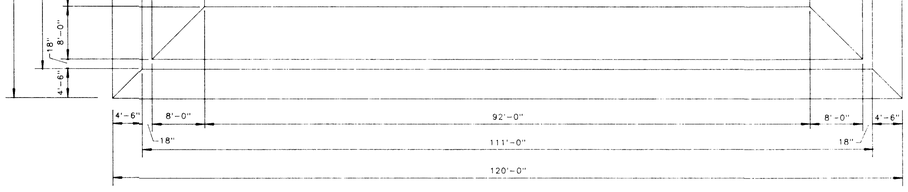
RZE



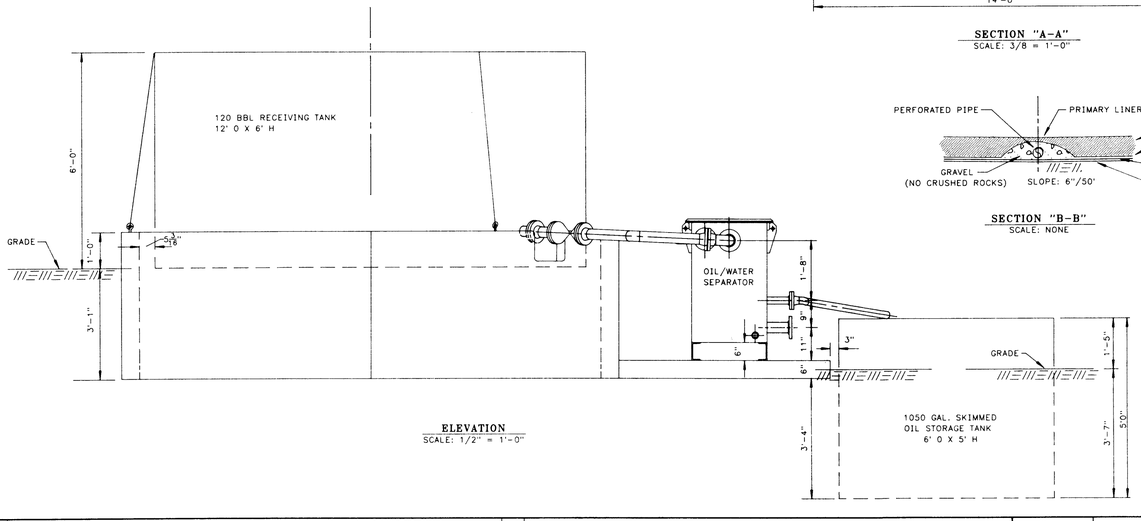
PLAN
SCALE: 1/2" = 1'-0"



SECTION "A-A"
SCALE: 3/8 = 1'-0"

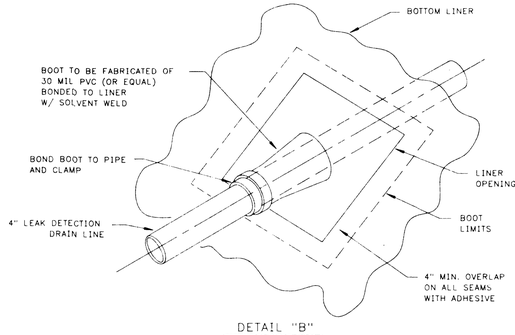


EVAPORATION POND
PLAN
SCALE: NONE

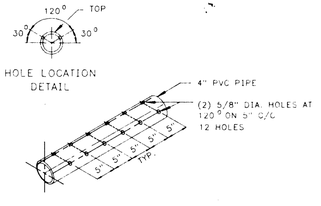


ELEVATION
SCALE: 1/2" = 1'-0"

SECTION "B-B"
SCALE: NONE



DETAIL "B"
LINER BOOT
SCALE: NONE
THIS DWG



HOLE LOCATION
DETAIL

DETAIL "A"
PERFORATED PIPE
SCALE: NONE

NOTE: INSTALLED AT BLANCO, CHACO, AND LINDRITH PLANT

LEGEND

DWG. NO.	TITLE

REFERENCE DRAWINGS

NO.	DATE	BY	DESCRIPTION	W.O.	APP.

REVISIONS

PRT.	SEP.	DATE	TO	W.O.

PRINT RECORD

ENG. RECORD		DATE
DRAFTING DESIGN	JN	1/26/87
COMPUTER GRAPHICS	MD	1/26/87
CHECKED		
PROJECT APPROVAL		
DESIGN APPROVAL		
COMPUTER SAVE NAME	STD117	

El Paso NATURAL GAS COMPANY

EVAPORATIION POND
PLANS AND SECTIONS

SCALE: NOTED
W.O.:

DWG. NO. STD-1-P16

REV.

MATCH LINE 0+00 FOR CONTINUATION SEE 2BP-1-P40

N

MATCH LINE W35+00 FOR CONTINUATION SEE 2BP-1-P39

MATCH LINE W19+00

S1+00
S2+00
S3+00
S4+00
S5+00
S6+00
S7+00
S8+00
S9+00

W34+00
W33+00
W32+00
W31+00
W30+00
W28+00
W27+00
W26+00
W25+00
W24+00
W23+00
W22+00
W21+00
W20+00

OFFICE, WAREHOUSE AND LAB
WAREHOUSE
OFFICE AREA
4" SEWER LINE
4" SEWER
4" SANITARY SEWER
WELD AND MACHINE SHOP
GARAGE, ELEC. & INSTR. SHOP
CHANGE HOUSE
FIRE HOUSE
FIRE CART HOUSE
GAS TO CONOCO

"D" TURBINE BLDG.

DITCH "B"
DITCH NO. 1
FIN-FANS
"A" COMP. BLDG.
"A COMPRESSOR AREA
DITCH NO. 2
FIN-FAN
PUMP HSE.
DITCH NO. 4
PROCESS PUMP HSE.
DITCH NO. 5
FIN-FAN
DITCH NO. 7
PUMP HOUSE
GASOLINE PLANT

CONCRETE DITCH NO. "A"
FIN-FAN
CONCRETE DITCH NO. "B"
CONCRETE DITCH NO. "A"
CONDENSATE TANKS
ELECTRIC SUB-STATION
V-74
V-6105
E-78
V6101
E6104
V-6103
BOILER AND GENERATOR BUILDING
ELEC. SUB STA.
V6102
V6101B
V-211A
V-210A
STEAM CONDENSERS
V3103
FF6102
FF6101
WTR. PURIFICATION BLDG.
DRAIN LINE
ELEC. SUB STA.
8"
4"
4"
6" SANITARY SEWER
DITCH NO. "B"

4" DRAIN
V-9117
2" DRAIN
"B" COMPR. BLDG.
HEAT EXCHANGERS
6" DRAIN
1 1/2" DRAIN
2" DRAIN
"B" COMPRESSOR AREA
PUMP HOUSE
AIR TANKS
FIN-FAN
6" DRAIN
8" WATER DRAIN
2" DRAIN
CONCRETE DITCH "D"
6" BACK WASH DRAIN
4" DRAIN
PUMP HOUSE
COOLING TOWER
2" DRAIN
HEAT RECOVERY BOILER B-6107
"C" COMPR. BLDG.
CONTROL BLDG.
2" H.P. DRAIN
2" L.P. DRAIN
"C" COMPRESSOR AREA
2" GRAVITY DRAIN
LAV. BUILDING
4" SEWER TILE
PUMP HSE.
REGEN. BLDG.
FIRED HEATER
4" SEWER TILE
COOLING TOWER
6" DRAIN
DEHYDRATORS
DEHYDRATORS
ABSORBERS
V-61B
V-61A
8" DRAIN
A.P.I. SEPARATOR
10" DRAIN
OIL SEP.
CONCRETE DITCH "D"
8" DRAIN
4" SEWER TILE

4"A
6"B
1 1/2"
8"C
V-8119
V-8121A
V-8121B
V-8121C
V-8121D
V-8121E
V-8121F
V-8121A
V-8121B
V-8121C
V-8121D
STORAGE TANKS
6"B
4"A
8"
1 1/2"
8"

MATCH LINE S10+00 FOR CONTINUATION SEE 2BP-1-P41

LEGEND

DWG. NO.	TITLE
REFERENCE DRAWINGS	

NO.	DATE	BY	DESCRIPTION	W. O.	APP.
REVISIONS					

PRT.	SEP.	DATE	TO	W. O.	PRT.	SEP.	DATE	TO	W. O.
PRINT RECORD									

ENG. RECORD		DATE
DRAFTING DESIGN	JC	9/1/83
COMPUTER GRAPHICS	FB-KS	9/6/83
CHECKED		
PROJECT APPROVAL		
DESIGN APPROVAL		
COMPUTER SAVE NAME	BLA133	

El Paso Natural Gas Company

RECEIVED
AUG 16 1989
OIL CONSERVATION DIV. SANTA FE

BLANCO PLANT
COMPRESSOR AREA
WASTE WATER DISPOSAL PLAN

SCALE: 1"=50'
W. O.

PLATE 2-3

REV.

MATCH LINE S10+00 SEE 2BP-1-P38

N

GRAVEL ROAD

DITCH NO. A

TANK STEAM CLEANING PAD

API SEPARATOR

DITCH NO. B

STORAGE TANKS

6"
4"
8"

4"

10" DRAIN

COOLING POND

SKIMMER TANK

SURGE BASIN

6"
8"
1 1/2"
8"

SOUTH FLARE PIT

SEPTIC TK.#2

SEPTIC TK.#1

MH

BOTH SEPTIC TKS. ABANDON IN PLACE

8" DRAIN

V.C. SEWER

EXISTING 8" SEWER LINE

CAMP LATERAL SEWER LINE

SPCC HOLDING POND

TWO SLUICE GATES

PLANT LATERAL SEWER LINE

OLD ABANDONED EVAPORATION POND

B.I.D. IRRIGATION CANAL

S10+00
S11+00
S12+00
S13+00
S14+00
S15+00
S16+00
S17+00
S18+00
S19+00
S20+00

MATCH LINE W35+00

MATCH LINE W19+00

W35+00 W34+00 W33+00 W32+00 W31+00 W30+00 W29+00 W28+00 W27+00 W26+00 W25+00 W24+00 W23+00 W22+00 W21+00 W20+00 W19+00

MATCH LINE S20+00

RECEIVED
JAN 27 1984
OIL CONSERVATION DIVISION
SANTA FE

LEGEND

DWG. NO.	TITLE
REFERENCE DRAWINGS	

NO.	DATE	BY	DESCRIPTION	W. O.	APP.
REVISIONS					

PRT.	SEP.	DATE	TO	W. O.	PRT.	SEP.	DATE	TO	W. O.
PRINT RECORD									

ENG. RECORD		DATE
DRAFTING DESIGN	JC	9/1/83
COMPUTER GRAPHICS	FB	9/6/83
CHECKED		
PROJECT APPROVAL		
DESIGN APPROVAL		
COMPUTER SAVE NAME	BLA136	

El Paso Natural Gas Company

BLANCO PLANT
SOUTH AREA PLAN
WASTE WATER DISPOSAL PLAN

SCALE: 1"=50'
W. O.

PLATE 2-4

REV.