GW - 52

PERMITS, RENEWALS, & MODS

Transwestern Pipeline Company
6381 North Main Street
Roswell, NM 88201
505-625-8022

February 3, 2012

UPS tracking No. 1Z 875 525 03 5184 1878

Mr. Leonard Lowe
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, New Mexico 87504

Re: Submittal of Permit Fee and Certification signature, Transwestern Pipeline Company, Roswell Compressor Station, Discharge Plan GW-052

Dear Mr. Lowe:

By this letter, Transwestern Pipeline Company, owner and operator of the Roswell Compressor Station, is submitting the required Flat Fee of $2600.00 for renewal of the discharge plan for the Roswell Compressor Station.

Should you require any additional information concerning this renewal request, contact the undersigned at our Roswell Technical Operations office at (575) 625-8022.

Sincerely,

Larry Campbell

Larry Campbell
Sr. Environmental Specialist

xc: Roswell Compressor Station
file

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. 541018532 dated 2/1/12

or cash received on _____ in the amount of $ 2600 00

from Transwestern Pipeline

for GW-52

Submitted by: Lawrence Romero Date: 2/8/12

Submitted to ASD by: [signature] Date: 2/8/12

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal _____

Modification _____ Other Discharge Plan

Organization Code 521.07 Applicable FY 2012

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

DISCHARGE PERMIT GW-052

1. GENERAL PROVISIONS:

A. PERMITTEE AND PERMITTED FACILITY: The Oil Conservation Division (OCD) of the Energy, Minerals and Natural Resources Department issues Discharge Permit GW-052 (Discharge Permit) to Transwestern Pipeline Company (Owner/Operator), located at 6381 North Main Street, Roswell, New Mexico 88201, to operate the Roswell Compressor Station (Facility) located in the SW/4 of the SW/4 of Section 21, Township 9 South, Range 24 East, NMPM, Chaves County.

The Facility is a mainline natural gas pipeline compressor station with two (2) 4500 hp Cooper Bessemer internal combustion engines, two (2) 4500 hp General Electric motors and one (1) 392 hp Ingersoll Rand internal combustion generator. The Facility is remediating contaminated soil and ground water through the use of multi-phase extraction wells. Approximately 10 gallons per minute of contaminated ground water is to be processed through a treatment system to remove contaminants to below WQCC ground water standards prior to surface applications. Ground water most likely to be affected by the discharge is at a depth of approximately 50 feet with a total dissolved solids concentration of approximately 2,600 mg/l. The discharge plan addresses ground water monitoring and the operation of the remediation system.

B. SCOPE OF PERMIT: OCD has been granted authority to administer the Water Quality Act (Chapter 74, Article 6 NMSA 1978) as it applies to gas compressor stations by statute and by delegation from the Water Quality Control Commission pursuant to Section 74-6-4(E) NMSA 1978.

The Water Quality Act and the rules issued under that Act protect ground water and surface water of the State of New Mexico by providing that, unless otherwise allowed by rule, no person shall cause or allow effluent or leachate to discharge so that it may move directly or indirectly into ground water unless such discharge is pursuant to an approved discharge plan. See 20.6.2.3104 NMAC and 20.6.2.3106 NMAC.

This Discharge Permit does not authorize any treatment of, or on-site disposal of, any materials, product, by-product, or oil field waste, including, but not limited to, the on-site disposal of lube oil, glycol, antifreeze, filters, elemental sulfur, washdown water, contaminated soil, and cooling tower blowdown water.

This Discharge Permit does not convey any property rights of any sort nor any exclusive privilege, and does not authorize any injury to persons or property, any invasion of other private rights, or any infringement of state, federal, or local laws, rules or regulations.

The Owner/Operator shall operate in accordance with the Discharge Permit conditions to comply with the Water Quality Act and the rules issued pursuant to that Act, so that neither a hazard to public health nor undue risk to property will result (see 20.6.2.3109C NMAC); so that no

discharge will cause or may cause any stream standard to be violated (see 20.6.2.3109H(2) NMAC); so that no discharge of any water contaminant will result in a hazard to public health, (see 20.6.2.3109H(3) NMAC); and so that the numerical standards specified of 20.6.2.3103 NMAC are not exceeded.

The Owner/Operator shall not allow or cause water pollution, discharge, or release of any water contaminant that exceeds the Water Quality Control Commission (WQCC) standards specified at 20.6.2.3101 NMAC and 20.6.2.3103 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams).

C. DISCHARGE PERMIT CONDITIONS: By signing this Discharge Permit, the Owner/Operator agrees to the specific provisions set out in this document, and the commitments made in the approved Discharge Plan Application and the attachments to that application, which are incorporated into the Discharge Permit by reference.

If this Discharge Permit is a permit renewal, it replaces the permit being renewed. Replacement of a prior permit does not relieve the Owner/Operator of its responsibility to comply with the terms of that prior permit while that permit was in effect.

D. DEFINITIONS: Terms not specifically defined in this Discharge Permit shall have the same meanings as those in the Water Quality Act or the rules adopted pursuant to that Act, as the context requires.

E. FILING FEES AND PERMIT FEES: Pursuant to 20.6.2.3114 NMAC, every facility that submits a discharge permit application for initial approval or renewal shall pay the permit fees specified in Table 1 and the filing fee specified in Table 2 of 20.6.2.3114 NMAC. OCD has already received the required $100.00 filing fee for this application. The flat fee for "Abatement of Ground Water and Vadose Zone Contamination at Oil and Gas Sites" is $2,600.00. The Owner/Operator shall submit this amount along with the signed Discharge Permit. Checks should be payable to the **"New Mexico Water Quality Management Fund,"** not the Oil Conservation Division.

F. EFFECTIVE DATE, EXPIRATION, RENEWAL CONDITIONS, AND PENALTIES FOR OPERATING WITHOUT A DISCHARGE PERMIT: This Discharge Permit is effective when the Division's Environmental Bureau receives the signed Discharge Permit from the Owner/Operator and the $2,600.00 fee. This Discharge Permit will expire on **December 21, 2015.** The Owner/Operator shall submit an application for renewal no later than 120 calendar days before that expiration date, pursuant to 20.6.2.3106F NMAC. If an Owner/Operator submits a renewal application at least 120 calendar days before the Discharge Permit expires and is in compliance with the approved Discharge Permit, then the existing Discharge Permit will not expire until OCD has approved or disapproved the renewal application. Operating with an expired Discharge Permit may subject the Owner/Operator to civil and/or criminal penalties. See Section 74-6-10.1 NMSA 1978 and Section 74-6-10.2 NMSA 1978.

G. MODIFICATIONS: The Owner/Operator shall notify the Division's Environmental Bureau of any facility expansion, production increase, or process modification that would result in any significant modification in the discharge of water contaminants. See 20.6.2.3107C NMAC. The Division's Environmental Bureau may require the Owner/Operator to submit a permit modification pursuant to 20.6.2.3109E NMAC and may modify or terminate a permit pursuant to Section 74-6-5(M) through (N) NMSA 1978.

H. TRANSFER OF DISCHARGE PERMIT: Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of the Facility, the transferor shall notify the transferee in writing of the existence of the Discharge Permit, and shall deliver or send by certified mail to the Division's Environmental Bureau a copy of such written notification, together with a certification or other proof that such notification has been received by the transferee pursuant to 20.6.2.3111 NMAC. Upon receipt of such notification, the transferee shall inquire into all of the provisions and requirements contained in the Discharge Permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the Division's file or files concerning the Discharge Permit. Upon assuming either ownership or possession of the Facility the transferee shall have the same rights and responsibilities under the Discharge Permit as were applicable to the transferor. See 20.6.2.3111 NMAC.

Transfer of the ownership, control, or possession of the Facility does not relieve the transferor of responsibility or liability for any act or omission which occurred while the transferor owned, controlled, or was in possession of the Facility. See 20.6.2.3111E NMAC.

I. CLOSURE PLAN AND FINANCIAL ASSURANCE: The Owner/Operator shall notify the Division's Environmental Bureau in writing when any operations of its Facility are to be discontinued for a period in excess of six months. Upon review of the Owner/Operator's notice, the Division's Environmental Bureau will determine whether to modify this permit, pursuant to 20.6.2.3107 NMAC and 20.6.2.3109E NMAC, to require the Owner/Operator to submit a closure plan and/or post-closure plan, including financial assurance.

J. COMPLIANCE AND ENFORCEMENT: If the Owner/Operator violates or is violating a condition of this Discharge Permit, the Division's Environmental Bureau may issue a compliance order requiring compliance immediately or within a specified time period, suspending or terminating this Discharge Permit, and/or assessing a civil penalty. See Section 74-6-10 NMSA 1978. The Division's Environmental Bureau may also commence a civil action in district court for appropriate relief, including injunctive relief. See Section 74-6-10(A)(2) NMSA 1978 and Section 74-6-11 NMSA 1978. The Owner/Operator may be subject to criminal penalties for discharging a water contaminant without a discharge permit or in violation of a condition of a discharge permit; making any false material statement, representation, certification or omission of material fact in an application, record, report, plan or other document filed, submitted or required to be maintained under the Water Quality Act; falsifying, tampering with or rendering inaccurate any monitoring device, method or record required to be maintained under the Water Quality Act; or failing to monitor, sample or report as required by a permit issued pursuant to a state or federal law or regulation. See Section 74-6-10.2 NMSA 1978.

2. GENERAL FACILITY OPERATIONS:

A. OPERATIONAL MONITORING: The Owner/Operator shall comply with its approved monitoring programs pursuant 20.6.2.4105A(6) NMAC.

1. Ground Water Monitoring System: The Owner/Operator shall monitor and sample all ground waste monitor wells at least semi-annually in accordance in accordance with its approved remediation plan.

2. Monthly Ground Water Recovery, Treatment, And Irrigation System: The Owner/Operator shall monitor and sample the ground water recovery, treatment, and irrigation system at least monthly when the system is in operation.

B. POST-CLOSURE MONITORING: The Owner/Operator shall comply with its approved post-closure monitoring program pursuant 20.6.2.3107 NMAC (Continuation of monitoring after cessation of operations).

C. CONTINGENCY PLANS: The Owner/Operator shall implement its approved Contingency Plans to cope with failure of the discharge permit or system in accordance with Permit Condition 2.F.

D. CLOSURE PLAN: After completing abatement of all ground water and vadose contamination required under Permit Condition 2.G, the Owner/Operator shall perform the following closure measures:

1. Remove or plug all lines leading to and from the extraction wells and the injection wells so that a discharge can no longer occur.

2. Remove all remediation system components from the site, if applicable.

3. After receiving notification from the Division's Environmental Bureau that post-closure monitoring may cease, the Owner/Operator shall plug and abandon the monitoring well(s).

E. RECORD KEEPING: The Owner/Operator shall maintain records of all inspections required by this Discharge Permit at its Roswell office for a minimum of five years and shall make those records available for inspection by the Division's Environmental Bureau.

F. RELEASE REPORTING: The Owner/Operator shall comply with the following permit conditions, pursuant to 20.6.2.1203 NMAC, if it determines that a release of oil or other water contaminant, in such quantity as may with reasonable probability injure or be detrimental to human health, animal or plant life, or property, or unreasonably interfere with the public welfare or the use of property, has occurred. The Owner/Operator shall report unauthorized releases of water contaminants in accordance with any additional commitments made in its approved Contingency Plan. If the Owner/Operator determines that any constituent exceeds the

standards specified at 20.6.2.3103 NMAC, then it shall report a release to the Division's Environmental Bureau.

1. **Oral Notification:** As soon as possible after learning of such a discharge, but in no event more than twenty-four (24) hours thereafter, the Owner/Operator shall orally notify the Division's Environmental Bureau. The Owner/Operator shall provide the following:

- the name, address, and telephone number of the person or persons in charge of the facility, as well as of the Owner/Operator of the facility;
- the name and location of the facility;
- the date, time, location, and duration of the discharge;
- the source and cause of discharge;
- a description of the discharge, including its chemical composition;
- the estimated volume of the discharge; and,
- any actions taken to mitigate immediate damage from the discharge.

2. **Written Notification:** Within one week after the Owner/Operator has learned of the discharge, the Owner/Operator shall send written notification to the Division's Environmental Bureau verifying the prior oral notification as to each of the foregoing items and providing any appropriate additions or corrections to the information contained in the prior oral notification.

G. **ABATEMENT PLAN:** Pursuant to 20.6.2.4105A(6) NMAC, an Owner/Operator is exempt from the requirement to obtain and implement an Abatement Plan, as required in 20.6.2.4104 NMAC. However, an Owner/Operator's Discharge Permit must address abatement of contaminated ground water and be consistent with the requirements and provisions of Sections 20.6.2.4101, 20.6.2.4103, Subsections C and E of Section 20.6.2.4106, Sections 20.6.2.4107 and 20.6.2.4112 NMAC.

1. **Purpose of Abatement Plan:** The Owner/Operator shall abate polluted ground water so as to either remediate or protect the ground water for use as domestic and agricultural water supply.

2. **Abatement Standards and Requirements:** The Owner/Operator shall abate the vadose zone so that water contaminants in the vadose zone shall not contaminate ground water or surface water, through leaching, percolation or as the water table elevation fluctuates. The Owner/Operator, where the Total Dissolved Solids concentration is 10,000 mg/L or less, shall abate contaminated ground water so that toxic pollutant(s), as defined in 20.6.2.7WW NMAC, shall not be present and so that the standards of 20.6.2.3103 NMAC shall be met.

3. **Soil Vapor Extraction System:** The Owner/Operator shall operate its soil vapor extraction (SVE) system, monitor, and sample as described in the *"Conceptual Remedial Design and Discharge Plan Modification"* document dated September 10, 2002.

4. **Ground Water Recovery, Treatment, and Irrigation System:** The Owner/Operator shall operate its ground water recovery, treatment, and irrigation system,

monitor, and sample as described in the *"Conceptual Remedial Design and Discharge Plan Modification"* document dated September 10, 2002.

5. **Completion and Termination:** Pursuant to 20.6.2.4112 NMAC, abatement shall be considered complete when the standards and requirements specified in 20.6.2.4103 NMAC are met. At that time, the Owner/Operator shall submit an abatement completion report, documenting compliance with the standards and requirements set forth in 20.6.2.4103 NMAC and this Discharge Permit, to Division's Environmental Bureau for approval. The abatement completion report also shall propose any changes to long term monitoring and site maintenance activities, if needed, to be performed after termination of the abatement plan.

H. OTHER REQUIREMENTS:

1. **Inspection and Entry:** Pursuant to 20.6.2.4107A NMAC, the Owner/Operator shall allow the Division's Environmental Bureau, upon the presentation of proper credentials, to:

- enter the facility at reasonable times;
- inspect and copy records required by this discharge permit;
- inspect any treatment works, monitoring, and analytical equipment;
- sample any wastes, ground water, surface water, stream sediment, plants, animals, or vadose-zone material including vadose-zone vapor;
- use the Owner/Operator's monitoring systems and wells in order to collect samples; and
- gain access to off-site property not owned or controlled by the Owner/Operator, but accessible to the Owner/Operator through a third-party access agreement, provided that it is allowed by the agreement.

2. **Advance Notice:** Pursuant to 20.6.2.4107B NMAC, the Owner/Operator shall provide the Division's Environmental Bureau with at least four (4) working days advance notice of any sampling to be performed pursuant to this Discharge Permit, or any well plugging, abandonment or destruction at the facility site.

3. **Plugging and Abandonment:** Pursuant to 20.6.2.4107C NMAC, the Owner/Operator shall request by certified mail, approval by the Division's Environmental Bureau to plug and abandon a monitor well, unless such approval is required from the State Engineer. The proposed action shall be designed to prevent water pollution that could result from water contaminants migrating through the well or borehole. The proposed action shall not take place without written approval from the Division's Environmental Bureau, unless written approval or disapproval is not received by the Owner/Operator within thirty (30) days of the date of receipt of the proposal.

I. ANNUAL REPORT: The Owner/Operator shall submit its annual report for each calendar year pursuant to 20.6.2.3107 NMAC to the Division's Environmental Bureau by March 15th of the following year. The annual report shall include the following:

1. Results of ground water monitoring and abatement program; including:

- Summary tables listing laboratory analytic results of all ground water and soil samples. Any WQCC constituent found to exceed the groundwater standard shall be highlighted and noted in the annual report. Copies of the most recent year's laboratory analytical data sheets shall also be submitted.
- Annual water table potentiometric maps. A corrected water table elevation shall be determined for all wells containing non-aqueous phase liquids. These maps shall show well locations, pertinent site features, and the direction and magnitude of the hydraulic gradient.
- Semi-annual isopleth maps for the following constituents: non-aqueous phase liquids; benzene; and, BTEX.
- Semi-annual geologic cross-sections (both dip and strike), using the geologic/lithologic logs from the monitor and recovery wells, depicting the concentrations for the following constituents: non-aqueous phase liquids; benzene; and, BTEX.
- Estimate or measure of the volume of non-aqueous phase liquid recovered during each quarter and the total recovered to date.

2. Summary of the volume and quality of the discharged treated ground water; and,

3. Summary of any releases and corrective actions taken in accordance with its approved Contingency Plan.

3. CLASS V WELLS: Pursuant to 20.6.2.5002B NMAC, leach fields and other wastewater disposal systems at Division-regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are UIC Class V injection wells. This Discharge Permit does not authorize the use of a Class V injection well for the disposal of industrial waste at the Facility, except for the disposal of contaminated ground water. Pursuant to 20.6.2.5005 NMAC, the Owner/Operator shall close any Class V industrial waste injection wells at its Facility that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes (*e.g.,* septic systems, leach fields, dry wells, *etc.*) other than remediated ground water within 90 calendar days of the issuance of this Discharge Permit. The Owner/Operator shall document the closure of any Class V wells used for the disposal of non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes other than remediated ground water in its Annual Report.

Other Class V wells, including wells used only for the injection of domestic wastes, must be permitted by the New Mexico Environment Department.

4. SCHEDULE OF COMPLIANCE:

A. PERMIT CERTIFICATION: The Owner/Operator shall sign and return this Permit to the Division's Environmental Bureau within 45 days of its receipt of this Permit.

B. SUBMISSION OF THE PERMIT FEES: As specified in Permit Condition 1.F, the Owner/Operator shall submit the permit fee of $2,600.00 along with the signed Discharge Permit within 45 days of the receipt of the Discharge Permit. Checks should be payable to the **"New Mexico Water Quality Management Fund,"** not the Oil Conservation Division.

C. ANNUAL REPORT: As specified in Permit Condition 2.I, the Owner/Operator shall submit its annual report to the Division's Environmental Bureau by March 15th of each year.

5. CERTIFICATION: (OWNER/OPERATOR) by the officer whose signature appears below, acknowledges receipt of this Discharge Permit, and has reviewed its terms and conditions.

TRANSWESTERN PIPELINE CO. ROSWELL COMP. STA.
Company Name - print name

LARRY CAMPBELL
Company Representative - print name

Larry Campbell
Company Representative - Signature

Title: Sr. Environmental Specialist

Date: 2-3-2012

New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

John H. Bemis
Cabinet Secretary-Designate

Brett F. Woods, Ph.D.
Deputy Cabinet Secretary

Jami Bailey
Division Director
Oil Conservation Division

JANUARY 11, 2012

CERTIFIED MAIL
RETURN RECEIPT NO: 0919 5884

Mr. Larry Campbell
Senior Environmental Specialist
Transwestern Pipeline Company
6381 North Main Street
Roswell, New Mexico 88201

RE: OCD'S RESPONSE TO COMMENTS OF SEPTEMBER 28, 2011 OCD'S DRAFT APPROVAL FOR DISCHARGE PLAN RENEWAL DISCHARGE PERMIT GW-052 TRANSWESTERN PIPELINE COMPANY ROSWELL COMPRESSOR STATION, SW/4 OF THE SW/4 OF SECTION 21, TOWNSHIP 9 SOUTH, RANGE 24 EAST, NMPM, CHAVES COUNTY AND OCD APPROVAL OF DISCHARGE PERMIT RENEWAL:

Dear Mr. Campbell:

On August 15, 2011, the Oil Conservation Division (OCD) proposed to approve the renewal of Transwestern's (Owner/Operator) discharge permit for the above referenced facility, pursuant to the Water Quality Control Commission (WQCC) Regulations 20.6.2.3104 - 20.6.2.3114 NMAC. Transwestern reviewed the draft discharge permit and provided OCD with comments on August 22, 2011. OCD has reviewed Transwestern's comments and prepared this response to Transwestern's comments.

Transwestern's Comment 1: *The approved remediation plan did not include a Sampling Analysis Plan (SAP) because a SAP for the site was already established via the site assessment plans and subsequent reports. Furthermore, the SAP has changed over time to eliminate wells and analyses that were no longer needed to monitor site conditions. Since a proposed SAP is included with each annual report, I suggest we request the wording of this condition is modified as follows: "The Owner/Operator shall monitor and sample all ground water monitor wells at least semi-annually in accordance with the most recent approved remediation plan Sampling Analysis Plan."*

OCD Response to Transwestern's Comment 1: Transwestern's draft discharge permit did not refer to a Sampling and Analysis Plan - the draft discharge permit referred to Transwestern's approved remediation plan. This "approved remediation plan" consists of the following commitments, workplans, and approvals:

- September 10, 2003 "Conceptual Remedial Design And Discharge Plan Modification, Roswell Compressor Station, Transwestern Pipeline Company."
- August 30, 2003 "Conceptual Remedial Design, Roswell Compressor Station, Roswell, New Mexico."
- September 3, 2003 "Proposal For Installation Of Three Additional Monitor Wells, Roswell Compressor Station, Transwestern Pipeline Company".
- September 11, 2003: OCD approval letter.

Please note that OCD has commonly addressed sampling issues by adding a requirement such as *"All soil samples shall be obtained and analyzed using EPA approved methods and quality assurance/quality control (QA/QC) procedures."* However, OCD does not routinely require a stand-alone Sampling and Analysis Plan, but may approve such plans if they are included with a workplan.

OCD did not make the requested change because "Sampling and Analysis Plans," although important, only address how ground water or soil samples will be collected and analyzed. What OCD is referring to is equivalent to a Stage 2 Abatement Plan (see 20.6.2.4106D NMAC) that addresses the actual remediation of contaminated ground water.

However, OCD did change the discharge permit as follows to address Transwestern's concerns:

> *"The Owner/Operator shall monitor and sample all ground water monitor wells at least semi-annually in accordance with the most recent approved remediation plan."*

Transwestern's Comment 2: Item 2.I. Annual Report: "The annual report shall include the following: Semi-annual isopleth maps for the following constituents: non-aqueous phase liquids; chlorides; TPH-GRO; benzene; and, BTEX."

Our current SAP does not include chlorides and TPH-GRO. Chlorides were removed from the SAP presented in the Report of Groundwater Remediation Activities dated May 14, 2004. Chlorides and other select inorganics were removed from the SAP because the sampling history developed between 1995 through 2002 indicated that concentrations of inorganic constituents in the affected area were not elevated above concentrations outside the affected area. TPH-GRO is not included in the current or previous SAPs for the site because experience with this analysis at similar sites has indicated that it is generally not a reliable measure of water quality and because there is not an NMWQCC standard for TPH-GRO. I suggest we request that chlorides and TPH-GRO are removed from this Item.

Transwestern's Comment 3: "Semi-annual geologic cross-sections... depicting the concentrations for the following constituents: non-aqueous phase liquids; chlorides; TPH-GRO; benzene; and, BTEX." *Same as the comment above since our current SAP does not include chlorides and TPH-GRO. I suggest we request that chlorides and TPH-GRO are removed from this Item.*

OCD Response to Transwestern's Comments 2 and 3: After review, OCD has changed the discharge permit as requested by removing chlorides and TPH-GRO from the list of required constituents in the Annual Report.

OTHER CHANGES: OCD made other changes to Transwestern's permit as a result of comments made by other operators on similar permits. These changes are as follows:

OCD Change 1: OCD revised Section 2 by correcting several incorrect subsections.

OCD Change 2: OCD revised Permit Condition 2.H (formerly 2.I) by removing GRO/DRO and TPH.

OCD Change 3: OCD has determined that the draft permit incorrectly charged the $1700.00 flat fee for a gas compressor station rather than the correct $2600.00 flat fee for "abatement of ground water and vadose zone contamination at oil and gas sites." OCD changed the Section 1.E of the discharge permit to read as follows:

> *The flat fee for abatement of ground water and vadose zone contamination at oil and gas sites is $2,600.00.*

OCD APPROVAL OF DISCHARGE PERMIT RENEWAL: Pursuant to Water Quality Control Commission (WQCC) Regulations 20.6.2.3104 - 20.6.2.3114 NMAC, the Oil Conservation Division (OCD) hereby approves the discharge permit for Transwestern (Owner/Operator) for the above referenced facility, as revised in response to Transwestern's and others comments. Attached are two copies of the discharge permit. Please sign and return one copy to Oil Conservation Division's Santa Fe Office within 45 days of receipt of this letter including permit fees.

Please be advised that approval of this discharge permit does not relieve Transwestern of responsibility if operations result in pollution of surface water, ground water, or the environment. Nor does approval of the discharge permit relieve Transwestern of its responsibility to comply with any other applicable governmental authority's rules and regulations.

If you have any questions, please contact Leonard Lowe of my staff at (505-476-3492) or E-mail leonard.lowe@state.nm.us. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Jami Bailey
Director

JB/gvg

cc: Daniel Sanchez, OCD
Gabrielle Gerholt, OCD

DISCHARGE PERMIT GW-052

1. GENERAL PROVISIONS:

A. PERMITTEE AND PERMITTED FACILITY: The Oil Conservation Division (OCD) of the Energy, Minerals and Natural Resources Department issues Discharge Permit GW-052 (Discharge Permit) to Transwestern Pipeline Company (Owner/Operator), located at 6381 North Main Street, Roswell, New Mexico 88201, to operate the Roswell Compressor Station (Facility) located in the SW/4 of the SW/4 of Section 21, Township 9 South, Range 24 East, NMPM, Chaves County.

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discharge will cause or may cause any stream standard to be violated (see 20.6.2.3109H(2) NMAC); so that no discharge of any water contaminant will result in a hazard to public health, (see 20.6.2.3109H(3) NMAC); and so that the numerical standards specified of 20.6.2.3103 NMAC are not exceeded.

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D. DEFINITIONS: Terms not specifically defined in this Discharge Permit shall have the same meanings as those in the Water Quality Act or the rules adopted pursuant to that Act, as the context requires.

E. FILING FEES AND PERMIT FEES: Pursuant to 20.6.2.3114 NMAC, every facility that submits a discharge permit application for initial approval or renewal shall pay the permit fees specified in Table 1 and the filing fee specified in Table 2 of 20.6.2.3114 NMAC. OCD has already received the required $100.00 filing fee for this application. The flat fee for "Abatement of Ground Water and Vadose Zone Contamination at Oil and Gas Sites" is $2,600.00. The Owner/Operator shall submit this amount along with the signed Discharge Permit. Checks should be payable to the **"New Mexico Water Quality Management Fund,"** not the Oil Conservation Division.

F. EFFECTIVE DATE, EXPIRATION, RENEWAL CONDITIONS, AND PENALTIES FOR OPERATING WITHOUT A DISCHARGE PERMIT: This Discharge Permit is effective when the Division's Environmental Bureau receives the signed Discharge Permit from the Owner/Operator and the $2,600.00 fee. This Discharge Permit will expire on **December 21, 2015.** The Owner/Operator shall submit an application for renewal no later than 120 calendar days before that expiration date, pursuant to 20.6.2.3106F NMAC. If an Owner/Operator submits a renewal application at least 120 calendar days before the Discharge Permit expires and is in compliance with the approved Discharge Permit, then the existing Discharge Permit will not expire until OCD has approved or disapproved the renewal application. Operating with an expired Discharge Permit may subject the Owner/Operator to civil and/or criminal penalties. See Section 74-6-10.1 NMSA 1978 and Section 74-6-10.2 NMSA 1978.

G. MODIFICATIONS: The Owner/Operator shall notify the Division's Environmental Bureau of any facility expansion, production increase, or process modification that would result in any significant modification in the discharge of water contaminants. See 20.6.2.3107C NMAC. The Division's Environmental Bureau may require the Owner/Operator to submit a permit modification pursuant to 20.6.2.3109E NMAC and may modify or terminate a permit pursuant to Section 74-6-5(M) through (N) NMSA 1978.

H. TRANSFER OF DISCHARGE PERMIT: Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of the Facility, the transferor shall notify the transferee in writing of the existence of the Discharge Permit, and shall deliver or send by certified mail to the Division's Environmental Bureau a copy of such written notification, together with a certification or other proof that such notification has been received by the transferee pursuant to 20.6.2.3111 NMAC. Upon receipt of such notification, the transferee shall inquire into all of the provisions and requirements contained in the Discharge Permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the Division's file or files concerning the Discharge Permit. Upon assuming either ownership or possession of the Facility the transferee shall have the same rights and responsibilities under the Discharge Permit as were applicable to the transferor. See 20.6.2.3111 NMAC.

Transfer of the ownership, control, or possession of the Facility does not relieve the transferor of responsibility or liability for any act or omission which occurred while the transferor owned, controlled, or was in possession of the Facility. See 20.6.2.3111E NMAC.

I. CLOSURE PLAN AND FINANCIAL ASSURANCE: The Owner/Operator shall notify the Division's Environmental Bureau in writing when any operations of its Facility are to be discontinued for a period in excess of six months. Upon review of the Owner/Operator's notice, the Division's Environmental Bureau will determine whether to modify this permit, pursuant to 20.6.2.3107 NMAC and 20.6.2.3109E NMAC, to require the Owner/Operator to submit a closure plan and/or post-closure plan, including financial assurance.

J. COMPLIANCE AND ENFORCEMENT: If the Owner/Operator violates or is violating a condition of this Discharge Permit, the Division's Environmental Bureau may issue a compliance order requiring compliance immediately or within a specified time period, suspending or terminating this Discharge Permit, and/or assessing a civil penalty. See Section 74-6-10 NMSA 1978. The Division's Environmental Bureau may also commence a civil action in district court for appropriate relief, including injunctive relief. See Section 74-6-10(A)(2) NMSA 1978 and Section 74-6-11 NMSA 1978. The Owner/Operator may be subject to criminal penalties for discharging a water contaminant without a discharge permit or in violation of a condition of a discharge permit; making any false material statement, representation, certification or omission of material fact in an application, record, report, plan or other document filed, submitted or required to be maintained under the Water Quality Act; falsifying, tampering with or rendering inaccurate any monitoring device, method or record required to be maintained under the Water Quality Act; or failing to monitor, sample or report as required by a permit issued pursuant to a state or federal law or regulation. See Section 74-6-10.2 NMSA 1978.

2. GENERAL FACILITY OPERATIONS:

A. OPERATIONAL MONITORING: The Owner/Operator shall comply with its approved monitoring programs pursuant 20.6.2.4105A(6) NMAC.

1. Ground Water Monitoring System: The Owner/Operator shall monitor and sample all ground waste monitor wells at least semi-annually in accordance in accordance with its approved remediation plan.

2. Monthly Ground Water Recovery, Treatment, And Irrigation System: The Owner/Operator shall monitor and sample the ground water recovery, treatment, and irrigation system at least monthly when the system is in operation.

B. POST-CLOSURE MONITORING: The Owner/Operator shall comply with its approved post-closure monitoring program pursuant 20.6.2.3107 NMAC (Continuation of monitoring after cessation of operations).

C. CONTINGENCY PLANS: The Owner/Operator shall implement its approved Contingency Plans to cope with failure of the discharge permit or system in accordance with Permit Condition 2.F.

D. CLOSURE PLAN: After completing abatement of all ground water and vadose contamination required under Permit Condition 2.G, the Owner/Operator shall perform the following closure measures:

1. Remove or plug all lines leading to and from the extraction wells and the injection wells so that a discharge can no longer occur.

2. Remove all remediation system components from the site, if applicable.

3. After receiving notification from the Division's Environmental Bureau that post-closure monitoring may cease, the Owner/Operator shall plug and abandon the monitoring well(s).

E. RECORD KEEPING: The Owner/Operator shall maintain records of all inspections required by this Discharge Permit at its Roswell office for a minimum of five years and shall make those records available for inspection by the Division's Environmental Bureau.

F. RELEASE REPORTING: The Owner/Operator shall comply with the following permit conditions, pursuant to 20.6.2.1203 NMAC, if it determines that a release of oil or other water contaminant, in such quantity as may with reasonable probability injure or be detrimental to human health, animal or plant life, or property, or unreasonably interfere with the public welfare or the use of property, has occurred. The Owner/Operator shall report unauthorized releases of water contaminants in accordance with any additional commitments made in its approved Contingency Plan. If the Owner/Operator determines that any constituent exceeds the

standards specified at 20.6.2.3103 NMAC, then it shall report a release to the Division's Environmental Bureau.

1. **Oral Notification:** As soon as possible after learning of such a discharge, but in no event more than twenty-four (24) hours thereafter, the Owner/Operator shall orally notify the Division's Environmental Bureau. The Owner/Operator shall provide the following:

- the name, address, and telephone number of the person or persons in charge of the facility, as well as of the Owner/Operator of the facility;
- the name and location of the facility;
- the date, time, location, and duration of the discharge;
- the source and cause of discharge;
- a description of the discharge, including its chemical composition;
- the estimated volume of the discharge; and,
- any actions taken to mitigate immediate damage from the discharge.

2. **Written Notification:** Within one week after the Owner/Operator has learned of the discharge, the Owner/Operator shall send written notification to the Division's Environmental Bureau verifying the prior oral notification as to each of the foregoing items and providing any appropriate additions or corrections to the information contained in the prior oral notification.

G. ABATEMENT PLAN: Pursuant to 20.6.2.4105A(6) NMAC, an Owner/Operator is exempt from the requirement to obtain and implement an Abatement Plan, as required in 20.6.2.4104 NMAC. However, an Owner/Operator's Discharge Permit must address abatement of contaminated ground water and be consistent with the requirements and provisions of Sections 20.6.2.4101, 20.6.2.4103, Subsections C and E of Section 20.6.2.4106, Sections 20.6.2.4107 and 20.6.2.4112 NMAC.

1. **Purpose of Abatement Plan:** The Owner/Operator shall abate polluted ground water so as to either remediate or protect the ground water for use as domestic and agricultural water supply.

2. **Abatement Standards and Requirements:** The Owner/Operator shall abate the vadose zone so that water contaminants in the vadose zone shall not contaminate ground water or surface water, through leaching, percolation or as the water table elevation fluctuates. The Owner/Operator, where the Total Dissolved Solids concentration is 10,000 mg/L or less, shall abate contaminated ground water so that toxic pollutant(s), as defined in 20.6.2.7WW NMAC, shall not be present and so that the standards of 20.6.2.3103 NMAC shall be met.

3. **Soil Vapor Extraction System:** The Owner/Operator shall operate its soil vapor extraction (SVE) system, monitor, and sample as described in the *"Conceptual Remedial Design and Discharge Plan Modification"* document dated September 10, 2002.

4. **Ground Water Recovery, Treatment, and Irrigation System:** The Owner/Operator shall operate its ground water recovery, treatment, and irrigation system,

monitor, and sample as described in the *"Conceptual Remedial Design and Discharge Plan Modification"* document dated September 10, 2002.

5. **Completion and Termination:** Pursuant to 20.6.2.4112 NMAC, abatement shall be considered complete when the standards and requirements specified in 20.6.2.4103 NMAC are met. At that time, the Owner/Operator shall submit an abatement completion report, documenting compliance with the standards and requirements set forth in 20.6.2.4103 NMAC and this Discharge Permit, to Division's Environmental Bureau for approval. The abatement completion report also shall propose any changes to long term monitoring and site maintenance activities, if needed, to be performed after termination of the abatement plan.

H. OTHER REQUIREMENTS:

1. **Inspection and Entry:** Pursuant to 20.6.2.4107A NMAC, the Owner/Operator shall allow the Division's Environmental Bureau, upon the presentation of proper credentials, to:

- enter the facility at reasonable times;
- inspect and copy records required by this discharge permit;
- inspect any treatment works, monitoring, and analytical equipment;
- sample any wastes, ground water, surface water, stream sediment, plants, animals, or vadose-zone material including vadose-zone vapor;
- use the Owner/Operator's monitoring systems and wells in order to collect samples; and
- gain access to off-site property not owned or controlled by the Owner/Operator, but accessible to the Owner/Operator through a third-party access agreement, provided that it is allowed by the agreement.

2. **Advance Notice:** Pursuant to 20.6.2.4107B NMAC, The Owner/Operator shall provide the Division's Environmental Bureau with at least four (4) working days advance notice of any sampling to be performed pursuant to this Discharge Permit, or any well plugging, abandonment or destruction at the facility site.

3. **Plugging and Abandonment:** Pursuant to 20.6.2.4107C NMAC, the Owner/Operator shall request by certified mail, approval by the Division's Environmental Bureau to plug and abandon a monitor well, unless such approval is required from the State Engineer. The proposed action shall be designed to prevent water pollution that could result from water contaminants migrating through the well or borehole. The proposed action shall not take place without written approval from the Division's Environmental Bureau, unless written approval or disapproval is not received by the Owner/Operator within thirty (30) days of the date of receipt of the proposal.

I. ANNUAL REPORT: The Owner/Operator shall submit its annual report for each calendar year pursuant to 20.6.2.3107 NMAC to the Division's Environmental Bureau by March 15th of the following year. The annual report shall include the following:

1. Results of ground water monitoring and abatement program; including:

- Summary tables listing laboratory analytic results of all ground water and soil samples. Any WQCC constituent found to exceed the groundwater standard shall be highlighted and noted in the annual report. Copies of the most recent year's laboratory analytical data sheets shall also be submitted.
- Annual water table potentiometric maps. A corrected water table elevation shall be determined for all wells containing non-aqueous phase liquids. These maps shall show well locations, pertinent site features, and the direction and magnitude of the hydraulic gradient.
- Semi-annual isopleth maps for the following constituents: non-aqueous phase liquids; benzene; and, BTEX.
- Semi-annual geologic cross-sections (both dip and strike), using the geologic/lithologic logs from the monitor and recovery wells, depicting the concentrations for the following constituents: non-aqueous phase liquids; benzene; and, BTEX.
- Estimate or measure of the volume of non-aqueous phase liquid recovered during each quarter and the total recovered to date.

2. Summary of the volume and quality of the discharged treated ground water; and,

3. Summary of any releases and corrective actions taken in accordance with its approved Contingency Plan.

3. CLASS V WELLS: Pursuant to 20.6.2.5002B NMAC, leach fields and other wastewater disposal systems at Division-regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are UIC Class V injection wells. This Discharge Permit does not authorize the use of a Class V injection well for the disposal of industrial waste at the Facility, except for the disposal of contaminated ground water. Pursuant to 20.6.2.5005 NMAC, the Owner/Operator shall close any Class V industrial waste injection wells at its Facility that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes (*e.g.*, septic systems, leach fields, dry wells, *etc.*) other than remediated ground water within 90 calendar days of the issuance of this Discharge Permit. The Owner/Operator shall document the closure of any Class V wells used for the disposal of non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes other than remediated ground water in its Annual Report.

Other Class V wells, including wells used only for the injection of domestic wastes, must be permitted by the New Mexico Environment Department.

4. SCHEDULE OF COMPLIANCE:

A. PERMIT CERTIFICATION: The Owner/Operator shall sign and return this Permit to the Division's Environmental Bureau within 45 days of its receipt of this Permit.

B. SUBMISSION OF THE PERMIT FEES: As specified in Permit Condition 1.F, the Owner/Operator shall submit the permit fee of $1,600.00 along with the signed Discharge Permit within 45 days of the receipt of the Discharge Permit. Checks should be payable to the **"New Mexico Water Quality Management Fund,"** not the Oil Conservation Division.

E. ANNUAL REPORT: As specified in Permit Condition 2.I, the Owner/Operator shall submit its annual report to the Division's Environmental Bureau by March 15th of each year.

5. CERTIFICATION: (OWNER/OPERATOR) by the officer whose signature appears below, acknowledges receipt of this Discharge Permit, and has reviewed its terms and conditions.

_____
Company Name - print name

_____
Company Representative - print name

_____
Company Representative - Signature

Title:_____

Date: _____

AFFIDAVIT OF PUBLICATION
STATE OF NEW MEXICO

I, Corinna Martinez
Legals Clerk

Of the Roswell Daily Record, a daily newspaper published at Roswell, New Mexico do solemnly swear that the clipping hereto attached was published in the regular and entire issue of said paper and not in a supplement thereof for a period of:

one time with the issue dated

August 20, 2011

Clerk

Sworn and subscribed to before me

this 22nd August, 2011

Notary Public

My Commission expires
June 13, 2014

(SEAL)

Publish August 20, 2011

NOTICE OF PUBLICATION

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

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

(GW-052) Mr. Larry Campbell, Senior Environmental Specialist, Transwestern Pipeline Company, 6381 North Main Street, Roswell, New Mexico 88201, has submitted a renewal application for the previously approved discharge plan for their Roswell Compressor Station, located in the SW/4 SW/4 of Section 21, Township 9 South, Range 24 East, NMPM, Chavez County. The facility is a mainline natural gas pipeline compressor station with a total horsepower of 9000 HP. Ground water most likely to be affected by a spill, leak or accidental discharge is at a depth of approximately 240 feet, with a total dissolved solids concentration of approximately 1550 mg/L. The discharge permit specifies that Transwestern Pipeline will remediate contaminated ground at the site to meet the standards specified in the Water Quality Control Commission regulations (20.6.2.3103 NMAC). When in operation, the ground water recovery, treatment and irrigation system may discharge as much as 7200 gallons per day of treated ground water.

OCD has determined that the application is administratively complete and has prepared a draft permit. OCD will accept comments and statements of interest regarding this application and will create a facility-specific mailing list for persons who wish to receive future notices. Persons interested in obtaining further information, submitting comments or requesting to be on a facility-specific mailing list for future notices may contact the Environmental Bureau Chief of the Oil Conservation Division at the address given above. The administrative completeness determination and draft permit may be viewed at the above address between 8:00 a.m. and 4:00 p.m. Monday through Friday, or may also be viewed at OCD's web site http://www.emnrd.state.nm.us/ocd/. Persons interested in obtaining a copy of the application and draft permit may contact the OCD at the address given above. Prior to ruling on any proposed discharge permit or major modification, the Director shall allow a period of at least thirty (30) days after the date of publication of this notice during which interested persons may submit comments or request that OCD hold a public hearing. Requests for a public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines that there is significant public interest.

If no public hearing is held, the Director will approve or disapprove the proposed permit based on information available, including all comments received. If a public hearing is held, the director will approve or disapprove the proposed permit based on information in the permit application and information submitted at the hearing.

Para obtener mas informacion sobre esta solicitud en espan ol, sirvase comunicarse por favor: New Mexico Energy, Minerals and Natural Resources Department (Depto. Del Energia, Minerals y Recursos Naturales de Nuevo Mexico), Oil Conservation Division (Depto. Conservacio n Del Petróleo), 1220 South St. Francis Drive, Santa Fé, New Mexico (Contacto: Dorothy Phillips, 505-476-3461)

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this **7th** day of August 2011.

Susana Martinez
Governor

John H. Bemis
Cabinet Secretary-Designate

Brett F. Woods, Ph.D.
Deputy Cabinet Secretary

Jami Bailey
Division Director
Oil Conservation Division

AUGUST 15, 2011

Mr. Larry Campbell
Senior Environmental Specialist
Transwestern Pipeline Company
6381 North Main Street
Roswell, New Mexico 88201

Re: Discharge Plan Renewal Permit GW-052
Western Refining Southwest
Former Bloomfield Refinery
San Juan County, New Mexico

Dear Mr. Campbell:

The Oil Conservation Division (OCD) has received Transwestern Pipeline Company's request and initial fee, dated August 24, 2010 to renew GW-052 for their Roswell Compressor Station located in the SW/4 of the SW/4 of Section 21, Township 9 South, Range 24 East, NMPM, Chaves County. The initial submittal provided the required information in order to deem the application "administratively" complete.

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

If there are any questions regarding this matter, please do not hesitate to contact me at (505) 476-3492 or leonard.lowe@state.nm.us. On behalf of the staff of the NMOCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Leonard Lowe
Environmental Engineer

LRL/lrl

New Mexico Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

John H. Bemis
Cabinet Secretary-Designate

Brett F. Woods, Ph.D.
Deputy Cabinet Secretary

Jami Bailey
Division Director
Oil Conservation Division

AUGUST 15, 2011

CERTIFIED MAIL
RETURN RECEIPT NO: 0919 5822

Mr. Larry Campbell
Senior Environmental Specialist
Transwestern Pipeline Company
6381 North Main Street
Roswell, New Mexico 88201

Re: Draft Approval for Discharge Plan Renewal Permit GW-052
Western Refining Southwest
Former Bloomfield Refinery
San Juan County, New Mexico

Dear Mr. Campbell:

Pursuant to Water Quality Control Commission (WQCC) Regulations 20.6.2.3104 - 20.6.2.3114 NMAC, the Oil Conservation Division (OCD) hereby proposes to approve the renewal of Western's (Owner/Operator) discharge permit for the above referenced facility contingent upon the conditions specified in the attached draft Discharge Permit. Please review and provide comments to OCD on the draft Discharge Permit within 45 days of receipt of this letter.

If you have any questions, please contact Leonard Lowe of my staff at (505-476-3492) or E-mail leonard.lowe@state.nm.us. On behalf of the staff of the OCD, I wish to thank you and your staff for your cooperation during this discharge permit review.

Sincerely,

Glenn von Gonten
Acting Environmental Bureau Chief

GvG/gvg

DISCHARGE PERMIT GW-052

1. GENERAL PROVISIONS:

A. PERMITTEE AND PERMITTED FACILITY: The Oil Conservation Division (OCD) of the Energy, Minerals and Natural Resources Department issues Discharge Permit GW-052 (Discharge Permit) to Transwestern Pipeline Company (Owner/Operator), located at 6381 North Main Street, Roswell, New Mexico 88201, to operate the Roswell Compressor Station (Facility) located in the SW/4 of the SW/4 of Section 21, Township 9 South, Range 24 East, NMPM, Chaves County.

The Facility is a mainline natural gas pipeline compressor station with two (2) 4500 hp Cooper Bessemer internal combustion engines, two (2) 4500 hp General Electric motors and one (1) 392 hp Ingersoll Rand internal combustion generator. The Facility is remediating contaminated soil and ground water through the use of multi-phase extraction wells. Approximately 10 gallons per minute of contaminated ground water is to be processed through a treatment system to remove contaminants to below WQCC ground water standards prior to surface applications. Ground water most likely to be affected by the discharge is at a depth of approximately 50 feet with a total dissolved solids concentration of approximately 2,600 mg/l. The discharge plan addresses ground water monitoring and the operation of the remediation system.

B. SCOPE OF PERMIT: OCD has been granted authority to administer the Water Quality Act (Chapter 74, Article 6 NMSA 1978) as it applies to gas compressor stations by statute and by delegation from the Water Quality Control Commission pursuant to Section 74-6-4(E) NMSA 1978.

The Water Quality Act and the rules issued under that Act protect ground water and surface water of the State of New Mexico by providing that, unless otherwise allowed by rule, no person shall cause or allow effluent or leachate to discharge so that it may move directly or indirectly into ground water unless such discharge is pursuant to an approved discharge plan. See 20.6.2.3104 NMAC and 20.6.2.3106 NMAC.

This Discharge Permit does not authorize any treatment of, or on-site disposal of, any materials, product, by-product, or oil field waste, including, but not limited to, the on-site disposal of lube oil, glycol, antifreeze, filters, elemental sulfur, washdown water, contaminated soil, and cooling tower blowdown water.

This Discharge Permit does not convey any property rights of any sort nor any exclusive privilege, and does not authorize any injury to persons or property, any invasion of other private rights, or any infringement of state, federal, or local laws, rules or regulations.

The Owner/Operator shall operate in accordance with the Discharge Permit conditions to comply with the Water Quality Act and the rules issued pursuant to that Act, so that neither a hazard to public health nor undue risk to property will result (see 20.6.2.3109C NMAC); so that no

discharge will cause or may cause any stream standard to be violated (see 20.6.2.3109H(2) NMAC); so that no discharge of any water contaminant will result in a hazard to public health, (see 20.6.2.3109H(3) NMAC); and so that the numerical standards specified of 20.6.2.3103 NMAC are not exceeded.
The Owner/Operator shall not allow or cause water pollution, discharge, or release of any water contaminant that exceeds the Water Quality Control Commission (WQCC) standards specified at 20.6.2.3101 NMAC and 20.6.2.3103 NMAC or 20.6.4 NMAC (Water Quality Standards for Interstate and Intrastate Streams).

C. DISCHARGE PERMIT CONDITIONS: By signing this Discharge Permit, the Owner/Operator agrees to the specific provisions set out in this document, and the commitments made in the approved Discharge Plan Application and the attachments to that application, which are incorporated into the Discharge Permit by reference.

If this Discharge Permit is a permit renewal, it replaces the permit being renewed. Replacement of a prior permit does not relieve the Owner/Operator of its responsibility to comply with the terms of that prior permit while that permit was in effect.

D. DEFINITIONS: Terms not specifically defined in this Discharge Permit shall have the same meanings as those in the Water Quality Act or the rules adopted pursuant to those Act, as the context requires.

E. FILING FEES AND PERMIT FEES: Pursuant to 20.6.2.3114 NMAC, every facility that submits a discharge permit application for initial approval or renewal shall pay the permit fees specified in Table 1 and the filing fee specified in Table 2 of 20.6.2.3114 NMAC. OCD has already received the required $100.00 filing fee for this application. The flat fee for a gas compressor station of greater than 1001 horsepower is $1,700.00. The Owner/Operator shall submit this amount along with the signed Discharge Permit. Checks should be payable to the **"New Mexico Water Quality Management Fund,"** not the Oil Conservation Division.

F. EFFECTIVE DATE, EXPIRATION, RENEWAL CONDITIONS, AND PENALTIES FOR OPERATING WITHOUT A DISCHARGE PERMIT: This Discharge Permit is effective when the Division's Environmental Bureau receives the signed Discharge Permit from the Owner/Operator and the $1,700.00 fee. This Discharge Permit will expire on **December 21, 2015.** The Owner/Operator shall submit an application for renewal no later than 120 calendar days before that expiration date, pursuant to 20.6.2.3106F NMAC. If an Owner/Operator submits a renewal application at least 120 calendar days before the Discharge Permit expires and is in compliance with the approved Discharge Permit, then the existing Discharge Permit will not expire until OCD has approved or disapproved the renewal application. Operating with an expired Discharge Permit may subject the Owner/Operator to civil and/or criminal penalties. See Section 74-6-10.1 NMSA 1978 and Section 74-6-10.2 NMSA 1978.

G. MODIFICATIONS: The Owner/Operator shall notify the Division's Environmental Bureau of any facility expansion, production increase, or process modification that would result

in any significant modification in the discharge of water contaminants. See 20.6.2.3107C NMAC. The Division's Environmental Bureau may require the Owner/Operator to submit a permit modification pursuant to 20.6.2.3109E NMAC and may modify or terminate a permit pursuant to Section 74-6-5(M) through (N) NMSA 1978.

H. TRANSFER OF DISCHARGE PERMIT: Prior to any transfer of ownership, control, or possession (whether by lease, conveyance or otherwise) of the Facility, the transferor shall notify the transferee in writing of the existence of the Discharge Permit, and shall deliver or send by certified mail to the Division's Environmental Bureau a copy of such written notification, together with a certification or other proof that such notification has been received by the transferee pursuant to 20.6.2.3111 NMAC. Upon receipt of such notification, the transferee shall inquire into all of the provisions and requirements contained in the Discharge Permit, and the transferee shall be charged with notice of all such provisions and requirements as they appear of record in the Division's file or files concerning the Discharge Permit. Upon assuming either ownership or possession of the Facility the transferee shall have the same rights and responsibilities under the Discharge Permit as were applicable to the transferor. See 20.6.2.3111 NMAC.

Transfer of the ownership, control, or possession of the Facility does not relieve the transferor of responsibility or liability for any act or omission which occurred while the transferor owned, controlled, or was in possession of the Facility. See 20.6.2.3111E NMAC.

I. CLOSURE PLAN AND FINANCIAL ASSURANCE: The Owner/Operator shall notify the Division's Environmental Bureau in writing when any operations of its Facility are to be discontinued for a period in excess of six months. Upon review of the Owner/Operator's notice, the Division's Environmental Bureau will determine whether to modify this permit, pursuant to 20.6.2.3107 NMAC and 20.6.2.3109E NMAC, to require the Owner/Operator to submit a closure plan and/or post-closure plan, including financial assurance.

J. COMPLIANCE AND ENFORCEMENT: If the Owner/Operator violates or is violating a condition of this Discharge Permit, the Division's Environmental Bureau may issue a compliance order requiring compliance immediately or within a specified time period, suspending or terminating this Discharge Permit, and/or assessing a civil penalty. See Section 74-6-10 NMSA 1978. The Division's Environmental Bureau may also commence a civil action in district court for appropriate relief, including injunctive relief. See Section 74-6-10(A)(2) NMSA 1978 and Section 74-6-11 NMSA 1978. The Owner/Operator may be subject to criminal penalties for discharging a water contaminant without a discharge permit or in violation of a condition of a discharge permit; making any false material statement, representation, certification or omission of material fact in an application, record, report, plan or other document filed, submitted or required to be maintained under the Water Quality Act; falsifying, tampering with or rendering inaccurate any monitoring device, method or record required to be maintained under the Water Quality Act; or failing to monitor, sample or report as required by a permit issued pursuant to a state or federal law or regulation. See Section 74-6-10.2 NMSA 1978.

2. GENERAL FACILITY OPERATIONS:

A. OPERATIONAL MONITORING: The Owner/Operator shall comply with its approved monitoring programs pursuant 20.6.2.3107 NMAC.

1. Ground Water Monitoring System: The Owner/Operator shall monitor and sample all ground waste monitor wells at least semi-annually in accordance in accordance with its approved remediation plan.

2. Monthly Ground Water Recovery, Treatment, And Irrigation System: The Owner/Operator shall monitor and sample the ground water recovery, treatment, and irrigation system at least monthly when the system is in operation.

B. POST-CLOSURE MONITORING: The Owner/Operator shall comply with its approved post-closure monitoring program pursuant 20.6.2.3107 NMAC (Continuation of monitoring after cessation of operations).

C. CONTINGENCY PLANS: The Owner/Operator shall implement its approved Contingency Plans to cope with failure of the discharge permit or system in accordance with Permit Condition 2.F.

D. CLOSURE PLAN: After completing abatement of all ground water and vadose contamination required under Permit Condition 2.G, the Owner/Operator shall perform the following closure measures:

1. Remove or plug all lines leading to and from the extraction wells and the injection wells so that a discharge can no longer occur.

2. Remove all remediation system components from the site, if applicable.

3. After receiving notification from the Division's Environmental Bureau that post-closure monitoring may cease, the Owner/Operator shall plug and abandon the monitoring well(s).

E. RECORD KEEPING: The Owner/Operator shall maintain records of all inspections required by this Discharge Permit at its Roswell office for a minimum of five years and shall make those records available for inspection by the Division's Environmental Bureau.

F. RELEASE REPORTING: The Owner/Operator shall comply with the following permit conditions, pursuant to 20.6.2.1203 NMAC, if it determines that a release of oil or other water contaminant, in such quantity as may with reasonable probability injure or be detrimental to human health, animal or plant life, or property, or unreasonably interfere with the public welfare or the use of property, has occurred. The Owner/Operator shall report unauthorized releases of water contaminants in accordance with any additional commitments made in its approved Contingency Plan. If the Owner/Operator determines that any constituent exceeds the

standards specified at 20.6.2.3103 NMAC, then it shall report a release to the Division's Environmental Bureau.

1. **Oral Notification:** As soon as possible after learning of such a discharge, but in no event more than twenty-four (24) hours thereafter, the Owner/Operator shall orally notify the Division's Environmental Bureau. The Owner/Operator shall provide the following:

- the name, address, and telephone number of the person or persons in charge of the facility, as well as of the Owner/Operator of the facility;
- the name and location of the facility;
- the date, time, location, and duration of the discharge;
- the source and cause of discharge;
- a description of the discharge, including its chemical composition;
- the estimated volume of the discharge; and;
- any actions taken to mitigate immediate damage from the discharge.

2. **Written Notification:** Within one week after the Owner/Operator has learned of the discharge, the Owner/Operator shall send written notification to the Division's Environmental Bureau verifying the prior oral notification as to each of the foregoing items and providing any appropriate additions or corrections to the information contained in the prior oral notification.

G. ABATEMENT PLAN: Pursuant to 20.6.2.4105A(6) NMAC, an Owner/Operator is exempt from the requirement to obtain and implement an Abatement Plan, as required in 20.6.2.4104 NMAC. However, an Owner/Operator's Discharge Permit must address abatement of contaminated ground water and be consistent with the requirements and provisions of Sections 20.6.2.4101, 20.6.2.4103, Subsections C and E of Section 20.6.2.4106, Sections 20.6.2.4107 and 20.6.2.4112 NMAC.

1. **Purpose of Abatement Plan:** The Owner/Operator shall abate polluted ground water so as to either remediate or protect the ground water for use as domestic and agricultural water supply.

2. **Abatement Standards and Requirements:** The Owner/Operator shall abate the vadose zone so that water contaminants in the vadose zone shall not contaminate ground water or surface water, through leaching, percolation or as the water table elevation fluctuates. The Owner/Operator, where the Total Dissolved Solids concentration is 10,000 mg/L or less, shall abate contaminated ground water so that toxic pollutant(s), as defined in 20.6.2.7WW NMAC, shall not be present and so that the standards of 20.6.2.3103 NMAC shall be met.

3. **Soil Vapor Extraction System:** The Owner/Operator shall operate its soil vapor extraction (SVE) system, monitor, and sample as described in the *"Conceptual Remedial Design and Discharge Plan Modification"* document dated September 10, 2002.

4. **Ground Water Recovery, Treatment, and Irrigation System:** The Owner/Operator shall operate its ground water recovery, treatment, and irrigation system,

monitor, and sample as described in the *"Conceptual Remedial Design and Discharge Plan Modification"* document dated September 10, 2002.

5. **Completion and Termination:** Pursuant to 20.6.2.4112 NMAC, abatement shall be considered complete when the standards and requirements specified in 20.6.2.4103 NMAC are met. At that time, the Owner/Operator shall submit an abatement completion report, documenting compliance with the standards and requirements set forth in 20.6.2.4103 **NMAC** and this Discharge Permit, to Division's Environmental Bureau for approval. The abatement completion report also shall propose any changes to long term monitoring and site maintenance activities, if needed, to be performed after termination of the abatement plan.

H. OTHER REQUIREMENTS:

1. **Inspection and Entry:** Pursuant to 20.6.2.4107A NMAC, the Owner/Operator shall allow the Division's Environmental Bureau, upon the presentation of proper credentials, to:

- enter the facility at reasonable times;
- inspect and copy records required by this discharge permit;
- inspect any treatment works, monitoring, and analytical equipment;
- sample any wastes, ground water, surface water, stream sediment, plants, animals, or vadose-zone material including vadose-zone vapor;
- use the Owner/Operator's monitoring systems and wells in order to collect samples; and
- gain access to off-site property not owned or controlled by the Owner/Operator, but accessible to the Owner/Operator through a third-party access agreement, provided that it is allowed by the agreement.

2. **Advance Notice:** Pursuant to 20.6.2.4107B NMAC, The Owner/Operator shall provide the Division's Environmental Bureau with at least four (4) working days advance notice of any sampling to be performed pursuant to this Discharge Permit, or any well plugging, abandonment or destruction at the facility site.

3. **Plugging and Abandonment:** Pursuant to 20.6.2.4107C NMAC, the Owner/Operator shall request by certified mail, approval by the Division's Environmental Bureau to plug and abandon a monitor well, unless such approval is required from the State Engineer. The proposed action shall be designed to prevent water pollution that could result from water contaminants migrating through the well or borehole. The proposed action shall not take place without written approval from the Division's Environmental Bureau, unless written approval or disapproval is not received by the Owner/Operator within thirty (30) days of the date of receipt of the proposal.

I. ANNUAL REPORT:

The Owner/Operator shall submit its annual report pursuant to 20.6.2.3107 NMAC to the Division's Environmental Bureau by March 15th of each year. The annual report shall include the following:

1. Results of ground water monitoring and abatement program; including:

- Summary tables listing laboratory analytic results of all ground water and soil samples. Any WQCC constituent found to exceed the groundwater standard shall be highlighted and noted in the annual report. Copies of the most recent year's laboratory analytical data sheets shall also be submitted.
- Annual water table potentiometric maps. A corrected water table elevation shall be determined for all wells containing non-aqueous phase liquids. These maps shall show well locations, pertinent site features, and the direction and magnitude of the hydraulic gradient.
- Semi-annual isopleth maps for the following constituents: non-aqueous phase liquids; chlorides; TPH-GRO; benzene; and, BTEX.
- Semi-annual geologic cross-sections (both dip and strike), using the geologic/lithologic logs from the monitor and recovery wells, depicting the concentrations for the following constituents: non-aqueous phase liquids; chlorides; TPH-GRO; benzene; and, BTEX.
- Estimate or measure of the volume of non-aqueous phase liquid recovered during each quarter and the total recovered to date.

2. Summary of the volume and quality of the discharged treated ground water; and,

3. Summary of any releases and corrective actions taken in accordance with its approved Contingency Plan.

3. CLASS V WELLS: Pursuant to 20.6.2.5002B NMAC, leach fields and other wastewater disposal systems at Division-regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are UIC Class V injection wells. This Discharge Permit does not authorize the use of a Class V injection well for the disposal of industrial waste at the Facility, except for the disposal of contaminated ground water. Pursuant to 20.6.2.5005 NMAC, the Owner/Operator shall close any Class V industrial waste injection wells at its Facility that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes (*e.g.*, septic systems, leach fields, dry wells, *etc.*) other than remediated ground water within 90 calendar days of the issuance of this Discharge Permit. The Owner/Operator shall document the closure of any Class V wells used for the disposal of non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes other than remediated ground water in its Annual Report.

Other Class V wells, including wells used only for the injection of domestic wastes, must be permitted by the New Mexico Environment Department.

4. SCHEDULE OF COMPLIANCE:

A. PERMIT CERTIFICATION: The Owner/Operator shall sign and return this Permit to the Division's Environmental Bureau within 30 days of its receipt of this Permit.

B. SUBMISSION OF THE PERMIT FEES: As specified in Permit Condition 1.F, the Owner/Operator shall submit the permit fee of $1,700.00 along with the signed Discharge Permit within 30 days of the receipt of the Discharge Permit. Checks should be payable to the **"New Mexico Water Quality Management Fund,"** not the Oil Conservation Division.

E. ANNUAL REPORT: As specified in Permit Condition 2.I, the Owner/Operator shall submit its annual report to the Division's Environmental Bureau by March 15th of each year.

5. CERTIFICATION: (OWNER/OPERATOR) by the officer whose signature appears below, acknowledges receipt of this Discharge Permit, and has reviewed its terms and conditions.

_____
Company Name - print name

_____
Company Representative - print name

_____
Company Representative - Signature

Title: _____

Date: _____

ENERGY TRANSFER PARTNERS

Transwestern Pipeline Company

February 9, 2011

RECEIVED OCD
2011 FEB 11 A 7:21

UPS Tracking No. 1Z 875 525 03 4866 8992

Mr. Leonard Lowe
New Mexico Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87504

Re: Submittal of Drainline Testing Report, Transwestern Pipeline Company, Roswell Compressor Station, GW-052

Dear Mr. Lowe:

By this letter, Transwestern Pipeline Company is submitting the drainline testing results and report for the above referenced facility as required by Condition 10 of facility's discharge plan.

You will note that the drainline testing for the facility was completed in two phases. The first phase consisted a third party contractor (Gandy Corporation) testing all low pressure underground wastewater drainlines using the approved testing methodology which is presented in their report dated June 10, 2009. This testing showed all underground wastewater drainlines to be structurally sound and not leak. This report is presented in Attachment A. The second phase of testing completed on Janaury 24-25, 2011 consisted of testing all underground high pressure process lines using the methodology which was presented to you in an email in January 2011. The results of this testing showed that all high pressure lines were also structural sound and not leaking. The methodology and results of this testing is presented in Attachment B.

Should you have any additional question or require further information concerning this submittal, contact the undersigned at our Roswell Technical Operations office at (575) 625-8022.

Sincerely,

Larry Campbell
Sr. Environmental Specialist

Roswell Compressor Station envisions file no.

6381 N. Main
Roswell, NM 88201

Attachment A #:

Gandy Corp.

1621 S. Main Ave.

Lovington, NM 88260

(575) 396-0522

June 10, 2009

Attention: Larry Campbell

Re: Underground Drain Line Testing Roswell Compressor Station No.9, Transwestern Pipeline Company, OCD Renewal Discharge Plan No. GW-016.

The following report presents the results of the underground drain line testing at the Transwestern Pipeline Company (Transwestern) Compressor Station # 9 Roswell, New Mexico. This station is currently operating under the OCD Renewal Discharge plan GW-016, which requires drain line testing to be conducted on all underground drain lines once every five years. The testing program was conducted using the methodology submitted by letter on May 19th 2009.

Methodology

The testing program was initiated on June 3rd 2009. The following drain line systems at the facility were hydrostatically tested:

Drain Line System	Length of Line (ft.)	Size of pipe (in.)
Ambitrol tank to Comp. Bldg.	324	2.0
Electric oil pump to used oil tank	60	2.0
Gear oil tank to Comp. Bldg.	324	2.0
New lube oil tank to Comp. Bldg.	324	2.5
Comp. Bldg. to used oil tank	240	2.0
Selexol Sump to Selexol OWW (1) Tank	105	2.0
Scrubber dump to Selexol PLL (2) tank	100	2.0

Mist Extractor to PLL (2)	63	2.0
West Texas Pig Receiver Sump to PLL (2)	195	2.0
Wash Bay to West Texas Pig Trap Sump	90	4.0
PLL (2) Tank to Truck Loading Point	111	4.0
OWW (1) Tank to Truck Loading Point	111	4.0
Panhandle 24" Pig Receiver sump to OWW (1)	375	4.0
Comp. Bldg. OWW (1) Sump to OWW (1) Tank	1,230	2.0
Comp. Bldg. OWW (1) Sump	426	"4 drain lines to 8" header

(1) Oily Waste Water (OWW)

(2) Pipe Line Liquids (PLL)

Note: Length of lines are approximated

For each drain line tested, the following tactic was engaged. A test header was constructed by isolating each drain line and attaching and sealing a 90 degree elbow of the same pipe diameter to one of the two drain pipe ends. A seven (7) ft, vertical pipe of the same pipe diameter was attached and sealed to the exposed vertical end of the 90 degree elbow. At the horizontal terminal end of the exposed drain pipe a test plug was temporarily inserted and sealed. The drain line and attached test header were then filled with water to a marked level on the vertical pipe of 6.95 ft. above the horizontal elevation of the drain line. This water level head created a positive pressure of 3.0 psi on the existing piping system. This pressure was then allowed to equilibrate in the line and standpipe and the test was conducted for a period of thirty minutes, with no more than 1% loss/gain of pressure in the line. Any water leakage will be indicated by a drop on the water level of the vertical standpipe below the 6.95 ft mark. Also same procedure was used for gear oil, lube oil, and ambitrol.

Results and Conclusions

All drain lines referenced in the methodology section were tested according to the tactic presented above. For every underground process and wastewater line, there were no instances where the water level in the vertical standpipe receded below the water level mark of 6.95 ft., as well as, for the gear oil, and lube oil pipes. Based upon the result of this study, Gandy Corp. concludes that the integrity of the underground drain line system at Transwestern facility # 9 in Roswell New Mexico, are intact and that no further actions are required on these lines.

Lines not tested	Length of Line (ft.)	Size of Pipe (in.)
Main Line Block Valve S-1	340	2.0
Loop Line S-2	340	2.0
Engine Fuel Skid	1,130	2.0
West Texas Pig Receiver Main Loop Line	420	2.0
Lines to Mist Extractor	1,500	1" 2" 3" and 4" Lines all connected

If there are any questions or additional information regarding this testing procedure or report, please not hesitate to contact me at our Lovington office (575) 396-0522. Salvador Cano (915) 873-2101

– Attachment B4. –

HIGH PRESSURE DRAINLINE TESTING METHODOLOGY AND RESULTS

1. Prior to initiating the process line testing, a baseline reading was completed by walking over the ground surface of all high pressure underground process lines with a flame ionization detector (FID) at an approximate one (1) foot distance above ground surface (ags) to determine if possible natural gas interferences were present from adjacent equipment or that any of the pressurized lines to be tested were leaking. The instrument used to detect leaking natural gas prior to initiating the test was a Detecto-Pak 4, Flame Ionization Hydrocarbon Detector, Serial No. 1500549011, manufactured by Heath Consultants, Inc. Houston, TX. The sensitivity range of this instrument was 10.0 ppm. Baseline readings detected no leaking natural gas from any high pressure process line or the presence a positive interference.

2. Each process line was then pressurized with natural gas at a rate of 755 to 823 psi (calibrated and certified gauge) and allowed to equilibrate for two approximately two (2) hours. At the end of the two hour equilibration period, each underground process line was again walked over with the Detecto–Pak 4 at the same approximate one foot (ags) elevation to determine the presence of natural gas leaking from any line.

3. The results of the walkover after the approximate two hour pressurization period showed there to be no leaking natural gas from the underground process lines and that the integrity of these lines were structurally sound All testing was then concluded.

ENERGY TRANSFER PARTNERS
Transwestern Pipeline Company

August 24, 2010

Mr. Leonard Lowe
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, New Mexico 87504

Re: Submittal of Discharge Plan Renewal Application, Transwestern Pipeline Company, Roswell Compressor Station, Discharge Plan GW-052

Dear Mr. Lowe:

By this letter, Transwestern Pipeline Company is submitting the attached discharge renewal application for the Roswell Compressor Station. The $100.00 renewal fee has been previously submitted to your Agency.

Should you require any additional information concerning this renewal request, contact the undersigned at our Roswell Technical Operations office at (575) 625-8022.

Sincerely,

Larry Campbell

Larry Campbell
Sr. Environmental Specialist

xc: envisions file no. 205.1.20
Roswell Team
file

6381 N. Main
Roswell, NM 88201

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Revised June 10, 2003

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

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

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

☐ New ☒ Renewal ☐ Modification

1. Type: Compressor Station
2. Operator: Transwestern Pipeline Company
   Address: 6381 North Main St. Roswell, NM 88201
   Contact Person: Larry Campbell Phone: (575) 625-8022
3. Location: SW /4 SW /4 Section 21 Township 9S Range 24E
   Submit large scale topographic map showing exact location.
4. Attach the name, telephone number and address of the landowner of the facility site.
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
6. Attach a description of all materials stored or used at the facility.
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
10. Attach a routine inspection and maintenance plan to ensure permit compliance.
11. Attach a contingency plan for reporting and clean-up of spills or releases.
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
14. CERTIFICATIONI hereby certify that the information submitted with this application is true and correct to the best of my knowledge and belief.

Name: Larry Campbell Title: Sr. Environ. Specialist

Signature: Larry Campbell Date: 8-24-2010

E-mail Address: larry.campbell@energytransfer.com

Transwestern Pipeline Company
Roswell Compressor Station (GW-052)
Discharge Plan Renewal Application

1. Type of Operation

The facility is a mainline natural gas pipeline compressor station with the following site rated horsepower: two (2) 4500 hp Cooper Bessemer internal combustion engines, two (2) 4500 hp General Electric motors and one (1) 392 hp Ingersoll Rand internal combustion generator.

2. Name of Operator

The facility owner and operator is Transwestern Pipeline Company, 6381 North Main Street, Roswell, New Mexico, 88201. Facility contact is Larry Campbell. Contact phone number is (575) 625-8022.

3. Location of the Discharge Plan Facility

The facility is located in the SW /4, SW/4 of section 21, T.9S, R.24 E. GPS coordinates are N33.30324 and W104.31 032. A USGS 7.5 minute map accompanies this submittal in **Attachment A**.

4. Landowner

Refer to item no. 2 above.

5. Facility Description

A facility map accompanies this submittal and is presented in **Attachment A**.

6. Materials Stored or Used at the Facility

The following chemicals volumes represent the storage capacities of the tanks at the facility. This may or may not represent the actual volume of liquids stored.

Chemical	Solid/liquid	Container type	Volume	Location
Lubrication oil	Liquid	Tank	12,943 gal.	central area of yard
Ethylene glycol	Liquid	Tanks	2,705 gal	central area of yard
Condensate	Liquid	Tanks	21,000 gal	south and north area of yard
Oily wastewater	Liquid	Tank	17,640 gal	south and north area of yard
Degreaser/solvent	Liquid	Drum	85 gal	drum storage area

Corrosion inhibitor	Liquid	Drum	85 gal	drum storage area
Used Oil	Liquid	Tank	17,640 gal	south area of yard
Soap	Liquid	Drum	110 gal	drum storage area

7A.Sources and Quantities of Effluent and Waste Solids Generated at the Facility

Source	Mo. Generation Rate	Material
WASTES		
Scrubbers/mist extractor/filter separators	25 gal	Pipeline condensate
Used Oil filters	10 lb	Used filters
Pipeline sludge	5 lb	Waste sludge
Oily wastewater	100 gal	Oily wastewater
Sewage Wastes	N/A	City of Roswell
Office and domestic wastes	300 lb	Waste Mgt. SE New Mexico
CHEMICALS		
Ethylene glycol	15 gal	Ethylene glycol
Solvent/degreasers	10 gal	Spent degreaser
Soap	5 gal	Spent soap
Lubrication oil	25 gal	Used oil

7B.(1-2) Quality Characteristics

Presented in **Attachment B** are the analytical reports for the waste streams which are listed above. Due to the infrequent operation of this facility, the analytical reports may be historic in nature (pre 2005). In **Attachment C** find the MSDS for the above listed chemicals.

(3).Due to the infrequent operation of this facility, this compressor station generates extremely small quantities of the above listed used or spent materials. In addition, all chemicals and or waste materials are stored in segregated containers (drums and or tanks) with concrete secondary containments.

(4).Transwestern does not use chemicals that are defined as toxic or will generate a hazardous waste. In the Transwestern pipeline system, the pipeline liquids and pipeline sludge materials removed from the pipeline, there is the potential to generate very small concentrations of PCBs, arsenic, benzene, lead and flashpoint. The concentrations and generation rates of these contaminants are very low (less than 30 ppm) and approximate less than 5 gallons per year, respectively.

(5). Because Transwestern collects all waste materials in dedicated drums and or tanks, grab samples are the collection methodology Transwestern employs to obtain sample collections for liquids and solids.

(6). Because Transwestern employs the grab method of sample collection, the normal variation of this sample methodology is expected.

7C. All waste streams at this facility have been segregated and contents are stored in dedicated drums and tanks.

8A. Description of Current Liquid and solid Waste Collection /Storage/Disposal Procedures

(B1). All new and used liquid chemicals and wastes are directed through underground piping and stored in dedicated above ground tanks. Pipeline liquids generated at pigging locations are collected in below grade sumps and transferred via underground piping to a dedicated above ground tank. All solid wastes are stored in above ground dedicated drums or containers. The transfer of liquids in the underground lines are completed via pressurized natural gas or air.

(B2). All drum and tanks at the facility which store chemicals or wastes are contained in impermeable concrete secondary containment.

(B3). For the current discharge plan requirements, testing of process and drainlines at the facility has been partially completed, with the remainder of the lines to be tested and completed prior to November of 2010. The drainline testing methodology employed has been previously approved by the OCD and incorporated an internal pressure of 3 pounds per sq. inch on each underground line. Refer to **Attachment D** for the approval letter from the OCD approving of Transwestern's testing procedure.

Due to the age of the facility (1959 initiation date) and the numerous piping modifications and drain line additions added to the facility, the drain pipe specifications could not be determined.

(C)1. Transwestern does not dispose of any wastes onsite into a surface impoundment, leachfield, injection well, drying bed, pit or landfarm which is owned or operated by the facility.

(C)2. Transwestern Pipeline Company incorporates the service of Gandy Corporation in Lovington, NM for all offsite non hazardous waste recycling and disposal activities. All waste materials are transported via truck to the disposal/recycling facility in Lovington. The facility address is:

Gandy Corporation
P.O. Box 2140
Lovington, NM 88260

The Gandy Corporation disposal landfill and landfarm has been previously permitted by the OCD.

9.(A-B). Non applicable.

10. Inspection, Maintenance and Reporting

10(A-B). Not applicable. Transwestern does not discharge wastes into any surface impoundments or unit that has leak detection systems or ground water monitoring.

10(C). The direction of flow at the facility is in a westerly direction. The process equipment areas and tank and drum storage areas are located in the eastern portions of the facility. Concrete curbing, berms and asphalt driveways have been constructed in the westerly portions of the facility. During precipitation events, water flows to the west and is intersected by the asphalt roads and curbs and prevented from traveling offsite. This water is then allowed to evaporate.

11. Spill/Leak Prevention and Reporting Procedures (Contingency Plans)

An SPCC (Spill Prevention Control and Countermeasure) Plan has been prepared for the Roswell Compressor Station as the facility stores more than 1320 gallons of oil or liquid hydrocarbons. The plan has been activated and annual employee training is completed. The Plan addresses notification, spill response and contingency's to be employed in the event a spill or release has occurred. The facility has spill cleanup kits at various locations around the facility to immediately respond to a spill or release of a hydrocarbon or chemical substance.

11.(A). In addition to compliance with the SPCC plan, Transwestern is also committed to the requirements of OCD Rule 116 and WQCC 1203 for notification reporting and mitigation of spills and releases. Refer to **Attachment E** for Transwestern's approach to compliance with Rule 116 and WQCC 120.

11(B). Transwestern has no below grade tanks at this facility. As an internal requirement, Transwestern conducts monthly visual tank and containment inspections for all tanks that are storing chemical or hydrocarbon liquids at the facility. This applies to tanks other than domestic water. Should a leak occur at a tank or in a containment (failure of the SPCC plan), immediate measures are taken to stop the leak and or repair the containment area. Liquids released into the containment area are transferred into a waste tank and properly disposed.

For the integrity of the underground piping, Transwestern conducts the five (5) year drainline testing program for all process and waste drain lines as required by the NMOCD.

In the event chemical or hydrocarbon liquids contact the soil, Transwestern immediately excavates the contaminated soil and performs the appropriate analytical

testing to determine disposition. The contamination soil is excavated and confirmation sampling/excavation is continued until the contamination in the soil has been removed. Transwestern employs the 1993 NMOCD document entitled "GUIDLEINES FOR REMEDIATION OF LEAKS, SPILLS AND RELEASES" (**Attachment F**) for sampling and cleanup of all chemical and hydrocarbon spills and releases which have occurred on Transwestern property. The contaminated soil is then taken to the Gandy Corporation commercial landfill in Tatum, NM for proper disposition.

11(C). Not applicable. Transwestern does not use an injection well for onsite effluent disposal.

12. Site characteristics

12(A)(1). There are three (3) intermittent small arroyos that occur of the north, south and east sides of the property. They are dry and only flow water only during major precipitation events. Two (2) wells are located within one mile of the facility. One well is used to monitor regional groundwater activity by the Pecos Valley Artesian Conservancy District. This well is located approximately ten (10) feet from Transwestern's southeast property corner. The other well is located greater than one (1) mile east of the facility and is used as a livestock watering well.

12(A)(2). The groundwater is an artesian aquifer approximately 109 feet in depth. Chemical characteristics include 1000 mg/l chlorides, greater than 1000 mg/l TDS. The facility receives its drinking water from the City of Roswell. This well is located six (6) miles south of the facility. This information was obtained from the original OCD discharge plan application for this facility submitted in 1990.

The regional groundwater flow direction is to the southeast towards the Pecos River. (Reference: "Geohydrologic framework of Roswell Basin", Technical Report No. 42, New Mexico State Engineer, Santa Fe, NM, 1983).

12(A)(3). The soil types in and around the immediate vicinity of the facility are silty gravelly loams (URB, BAC), gypsiferous loam (Hha), all with permeabilities of 0.6 to 2.0 inches per hour. The aquifer is artesian from the San Andres limestone with solution cavities. The depth to rock is approximately sixty (60) feet at the base of the alluvium.

12(A)(4). There is no record of flooding onsite. Flood protection is achieved by the use of curbs and berms at the facility.

13. Other Compliance Information

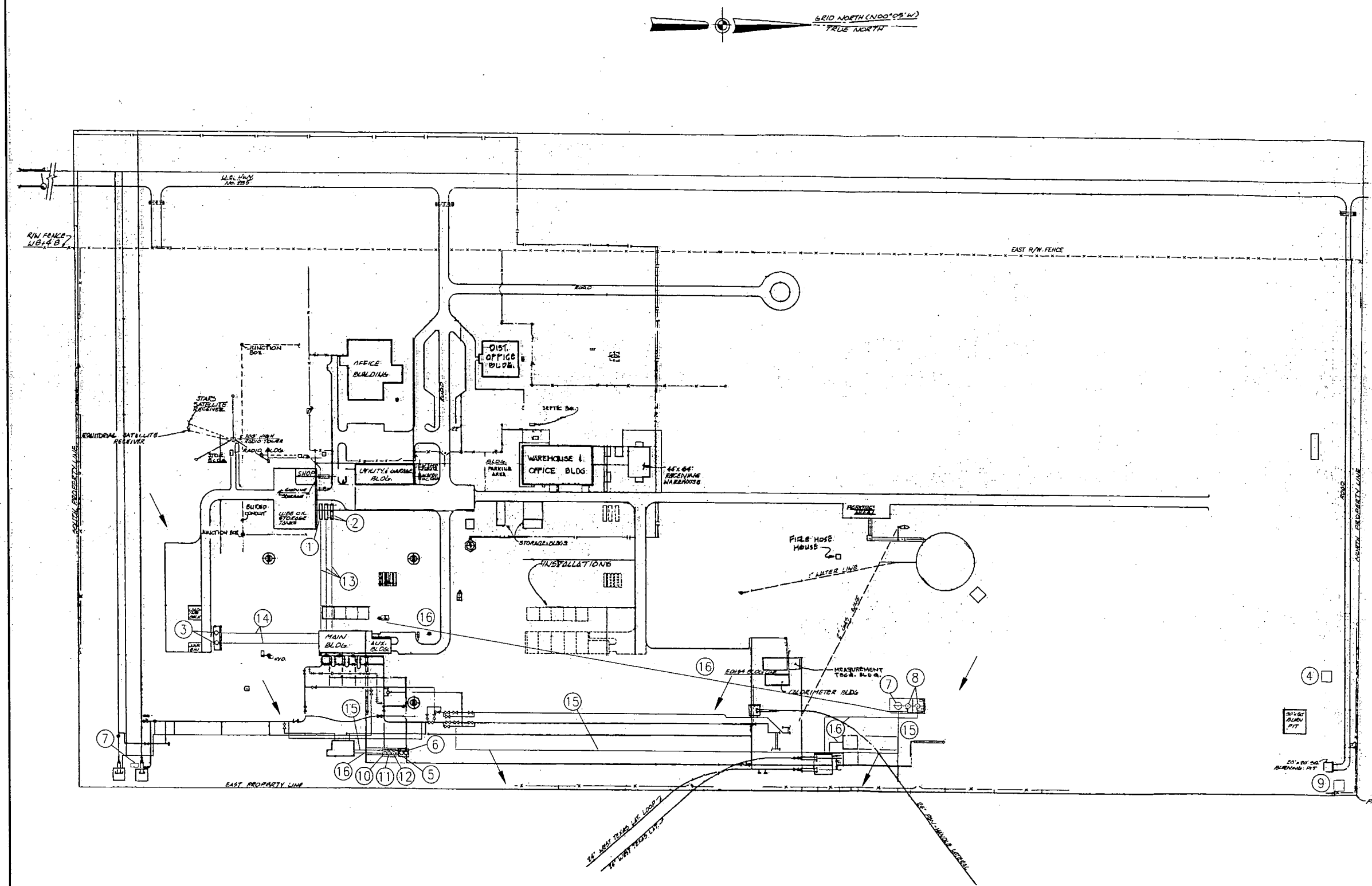
The Roswell Compressor Station uses the documents presented in **Attachments D through F** and the Corporate Environmental Policy and Guidelines to demonstrate and ensure compliance with all applicable rules administrated by the NMOCD. The

Roswell Compressor Station is committed to complying with NMOCD Rule 116 and WQCC Section 1203 for reporting spills, leaks and releases.

Upon facility closure, Rule 116 and WQCC Section 1203 will be employed to ensure that the abandonment and closure of the facility will not violate WQCC standards of Section 3103. Financial assurance is maintained by the construction bond Transwestern submitted to the State of New Mexico prior to facility construction in 1959. This bond money is designed to be used as needed for post closure activities related to site restoration which includes soil contamination sampling and excavation and post closure maintenance and monitoring.

Because it is impossible to predict and develop a future plan which will address all contingencies and requirements related to site closure at a future date, at such time that the facility ceases operation, Transwestern will present to the NMOCD a post closure plan which addresses site abandonment and soil cleanup activities. This plan will include maintenance and monitoring of the site to ensure that all Rule 116 and Section 1203 standards have been achieved or that all future Rules and Sections to be implemented will be adhered to and followed.

ATTACHMENT A
(7.5 Minute USGS Map of Facility)



BULK STORAGE CONTAINERS

1. GEAR OIL/GLYCOL OIL TANK
2. NEW LUBE OIL TANK
3. USED LUBE OIL TANK
4. REMEDIATION WATER TANK
5. PIPELINE LIQUIDS TANK
6. PIPELINE LIQUIDS TANK
7. PIPELINE LIQUIDS TANK
8. OILY WASTE WATER TANK
9. REMEDIATION PSH. TANK
10. PIPELINE LIQUIDS TANK
11. PIPELINE LIQUIDS TANK
12. PIPELINE LIQUIDS TANK

OIL PIPING

13. LUBE OIL
14. USED LUBE OIL
15. PIPELINE LIQUIDS
16. OILY WASTE WATER

TRANSWESTERN PIPELINE COMPANY

SPILL PREVENTION CONTROL & COUNTERMEASURE (SPCC) PLAN

STATION NO. 9, ROSWELL

SCALE 1"=100'-0"	DATE		
DRAWN HANK HOLLIS	5/19/92	JOB NO.	DRAWING NO.
CHECKED			9-85-000
APPROVED			
APPROVED ENG.			

ATTACHMENT B
(analytical Reports)

OAL

L15394

USED OIL

Client: **Enron Transwestern Pipeline**
Contact: **Raymond Hollon**

Project: **TWPG9**

STA 9

Volatiles
(Low Soil)
by EPA Method 8260

Sample ID	Analyte	Result	Blank Result	Reporting Limit	Units	Comment	*Lab Number*
001	*Soil*		MB0310U			Sampled : *03/01/00* Analyzed : *03/15/00*	*L15394-1*
CAS #							
75-71-8	Dichlorodifluoromethane	nd	nd	20	ug/Kg		
74-87-3	Chloromethane	nd	nd	20	ug/Kg		
75-01-4	Vinyl chloride	nd	nd	20	ug/Kg		
74-83-9	Bromomethane	nd	nd	20	ug/Kg		
75-00-3	Chloroethane	nd	nd	20	ug/Kg		
75-69-4	Trichlorofluoromethane	nd	nd	20	ug/Kg		
67-64-1	Acetone	nd	nd	200	ug/Kg		
75-35-4	1,1-Dichloroethene	nd	nd	10	ug/Kg		
75-09-2	Methylene chloride	nd	nd	20	ug/Kg		
75-15-0	Carbon disulfide	nd	nd	10	ug/Kg		
156-60-5	trans-1,2-Dichloroethene	nd	nd	10	ug/Kg		
75-34-3	1,1-Dichloroethane	nd	nd	10	ug/Kg		
78-93-3	2-Butanone	nd	nd	200	ug/Kg		
590-20-7	2,2-Dichloropropane	nd	nd	10	ug/Kg		
156-59-4	cis-1,2-Dichloroethene	nd	nd	10	ug/Kg		
74-97-5	Bromochloromethane	nd	nd	10	ug/Kg		
67-66-3	Chloroform	nd	nd	10	ug/Kg		
71-55-6	1,1,1-Trichloroethane	nd	nd	10	ug/Kg		
56-23-5	Carbon tetrachloride	nd	nd	10	ug/Kg		
563-58-6	1,1-Dichloropropene	nd	nd	10	ug/Kg		
71-43-2	Benzene	nd	nd	10	ug/Kg		
107-06-2	1,2-Dichloroethane	nd	nd	10	ug/Kg		
79-01-6	Trichloroethene	nd	nd	10	ug/Kg		

none detected = nd
Low soil method prepared inhouse.

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OAL

L15394

Client: **Enron Transwestern Pipeline**
Contact: **Raymond Hollon**

Project: **TWPG9**

Volatiles
(Low Soil)
by EPA Method 8260

Sample ID	Analyte	Result	Blank Result	Reporting Limit	Units	Comment	*Lab Number*
001	*Soil*		MB0310U			Sampled : *03/01/00* Analyzed : *03/15/00*	*L15394-1*
CAS #							
78-87-5	1,2-Dichloropropane	nd	nd	10	ug/Kg		
74-95-3	Dibromomethane	nd	nd	10	ug/Kg		
75-27-4	Bromodichloromethane	nd	nd	10	ug/Kg		
10061-01-5	cis-1,3-Dichloropropene	nd	nd	10	ug/Kg		
108-10-1	4-Methyl-2-pentanone	nd	nd	100	ug/Kg		
108-88-3	Toluene	nd	nd	10	ug/Kg		
591-78-6	2-Hexanone	nd	nd	100	ug/Kg		
10061-02-6	trans-1,3-Dichloropropene	nd	nd	10	ug/Kg		
79-00-5	1,1,2-Trichloroethane	nd	nd	10	ug/Kg		
127-18-4	Tetrachloroethene	nd	nd	10	ug/Kg		
542-75-6	1,3-Dichloropropane	nd	nd	10	ug/Kg		
124-48-1	Dibromochloromethane	nd	nd	10	ug/Kg		
106-93-4	1,2-Dibromoethane	nd	nd	10	ug/Kg		
108-90-7	Chlorobenzene	nd	nd	10	ug/Kg		
630-20-6	1,1,1,2-Tetrachloroethane	nd	nd	10	ug/Kg		
100-41-4	Ethylbenzene	nd	nd	10	ug/Kg		
100-42-5	Styrene	nd	nd	10	ug/Kg		
75-25-2	Bromoform	nd	nd	10	ug/Kg		
98-82-8	Isopropylbenzene	nd	nd	10	ug/Kg		
108-86-1	Bromobenzene	nd	nd	10	ug/Kg		
79-34-5	1,1,2,2-Tetrachloroethane	nd	nd	10	ug/Kg		
96-18-4	1,2,3-Trichloropropane	nd	nd	10	ug/Kg		
103-65-1	n-Propylbenzene	nd	nd	10	ug/Kg		

none detected = nd
Low soil method prepared inhouse.

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OAL

L15394

Client: **Enron Transwestern Pipeline**
Contact: **Raymond Hollon**

Project: **TWPG9**

Volatiles
(Low Soil)
by EPA Method 8260

Sample ID	Analyte	Result	Blank Result	Reporting Limit	Units	Comment	*Lab Number*
001	*Soil*		MB0310U			Sampled: *03/01/00* Analyzed: *03/15/00*	*L15394-1*
CAS #							
95-49-8	2-Chlorotoluene	nd	nd	10	ug/Kg		
106-43-4	4-Chlorotoluene	nd	nd	10	ug/Kg		
108-67-8	1,3,5-Trimethylbenzene	nd	nd	10	ug/Kg		
98-06-6	tert-Butylbenzene	nd	nd	10	ug/Kg		
95-63-6	1,2,4-Trimethylbenzene	nd	nd	10	ug/Kg		
135-98-8	sec-Butylbenzene	nd	nd	10	ug/Kg		
541-73-1	1,3-Dichlorobenzene	nd	nd	10	ug/Kg		
99-87-6	4-Isopropyltoluene	nd	nd	10	ug/Kg		
106-46-7	1,4-Dichlorobenzene	nd	nd	10	ug/Kg		
95-50-1	1,2-Dichlorobenzene	nd	nd	10	ug/Kg		
104-51-8	n-Butylbenzene	nd	nd	10	ug/Kg		
96-12-8	1,2-Dibromo-3-chloropropane	nd	nd	10	ug/Kg		
120-82-1	1,2,4-Trichlorobenzene	nd	nd	10	ug/Kg		
87-68-3	Hexachlorobutadiene	nd	nd	10	ug/Kg		
91-20-3	Naphthalene	nd	nd	10	ug/Kg		
87-61-6	1,2,3-Trichlorobenzene	nd	nd	10	ug/Kg		
	Total Xylenes	nd	nd	10	ug/Kg		

Surrogates	Recovery L15394-1	Recovery MB0310U
1,2-Dichloroethane-d4	93%	98%
Toluene-d8	94%	88%
4-Bromofluorobenzene	96%	91%

none detected = nd
Low soil method prepared inhouse.

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OAL

L15394

Client: ***Enron Transwestern Pipeline***
Contact: ***Raymond Hollon***

Project: ***TWPG9: Eng. Room drain Tk.***

Polynuclear Aromatic Hydrocarbons (PNA)

by EPA 8270 SIM

Sample ID	*Matrix*						*Lab Number*
CAS	**Analyte**	**Result**	**Reporting Limit**	**Units**	**Dilution**	**Comment**	
				Solids:	*97.8 % w/w*		
				Sampled:	*3/1/2000*		
				Extracted:	*3/13/2000*		
011	*soil*			**Analyzed:**	*3/13/2000 by GC*		*L15394-1*
	See Attached Data Sheet						

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Oregon Analytical Laboratory

14855 SW Scholls Ferry Rd
Beaverton OR 97007
(503) 590-5300
FAX (503) 590-1404
1-800-644-0967

Chain of Custody Record
Laboratory Analysis Request

Sampling: ☑ Grab ☐ Comp Page 1 of 1
OAL Hours _____ Site Visit ☐
ISCO _____
www.oalab.com

Client Information
Company ENRON
Contact RAYMOND HOLLON
Address 6381 N. MAIN ST.
ROSWELL, NM 88201
Phone # 505-625-8056 Fax # 505-625-8089

Billing Information
Company ENRON
Contact ~~RAYMOND HOLLON~~ LARRY CAMPBELL
Address 6381 N. MAIN ST.
ROSWELL, NM 88201
Phone # 505-625-8056 Fax # 505-625-8089

Project Information
Project Name ENG. ROOM DRAIN TK
Project #
P.O. #
Comments NE. CORNER ENG. BLDG AREA

Sampler's Name JIM KAPKA
Signature Jim Kapka

Quote #
NOTE: If quote number is not referenced, standard pricing will be applied.
Provide Fax Results ☐ Yes ☐ No

Remarks SAMPLE OF DIRT & GRAVEL ON N.E. CORNER OF ENG. BLDG. AROUND ENG. ROOM DRAIN TK.
SENT COPY OF ANALYSIS TO BUTCH RUSSEL AT SUMMIT OFFICE BLD. SUITE 250 4001 INDIAN SCHOOL ROAD N.E. ALB. N.M. 87110

	Sample Identification	Date	Time	FOR LAB USE ONLY OAL Login #	# of Containers	Matrix: Soil	Matrix: Water	Matrix: Other (Note in Remarks)	Analyses: Volatiles 8260 / 8240 (8010 / 8020)	Analyses: Semivolatiles 625 / 8270 (PAH(SIM)8270 / PAH8310)	Analyses: Organochlor Pest 608 / 8081 PCB 608 / 8082	Analyses: NW TPH-HCID Quantify? ☐ Yes ☐ No	Analyses: NW TPH Quantification G X DX/OIL	Analyses: BTEX 602 / 8021 ☐ MTBE ☐ Naphthalene	Analyses: Metals ☐ Total ☑ TCLP ☐ Dissolved As Ba Cd Cr Pb Hg Se Ag Other	Analyses:	Analyses:	Analyses:	Analyses:	Analyses:
1	011	3-1-00	11AM	L15394-1	1	✓			✓	✓										
2																				
3																				
4																				
5																				
6																				
7																				
8																				
9																				

Turnaround
(N) Normal – 10 working days
[S] Special – 5 working days
[R] Rush – 24-72 hrs
[O] Other – _____

Remarks
8260 & PAH per Raymond Hollon 3/8/00 - DGM

Relinquished
Signature: Jim Kapka Date: 3-1-00
Print Name: JIM KAPKA Time: 2:32 PM
Company: ETXS

Received
Signature: Raymond Hollon Date: 3/1/00
Print Name: RAYMOND HOLLON Time: 1425
Company: ETXS

Relinquished
Signature: [illegible] Date: [illegible]
Print Name: Time:
Company: UPS

Received
Signature: [illegible] Date: 3/8/00
Print Name: Doug McKenzie Time: 1030
Company: OAL

Relinquished
Signature: Date:
Print Name: Time:
Company:

Received
Signature: Date:
Print Name: Time:
Company:

☐ Courier ☒ UPS ☐ FedEx ☐ Other
Received @ 10 °C
Appropriate Containers ☒ Yes ☒ No should have Teflon Lid.
_____ 4oz./8oz. Jars
_____ VOA Vials
_____ Plastic Bottles
_____ Glass Bottles
1 Other mason Jar

OAL

L16833

Client: ***Enron Transwestern Pipeline***
Contact: ***Larry Campbell***

Project: ***TWPG8, Roswell, Enron Transport & Storage***

STA 9
PARTS WASHER SOLVENT

Semivolatiles
by EPA 8270

Sample ID	*Matrix*					*Lab Number*
CAS	Analyte	Result	Reporting Limit	Units	Dilution	Comment

		Sampled:	*6/14/2000*	
		Extracted:	*6/21/2000*	
PART WASH SOLV #1	*other (liquid)*	Analyzed:	*6/29/2000 by GC*	*L16833-1*
See Attached Data Sheet				

		Sampled:	*6/14/2000*	
		Extracted:	*6/21/2000*	
PART WASH SOLV #2	*other (liquid)*	Analyzed:	*6/29/2000 by GC*	*L16833-2*
See Attached Data Sheet				

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OAL

L16833

Client: **Enron Transwestern Pipeline**
Contact: **Larry Campbell**

Project: **TWPG8, Roswell, Enron Transport & Storage**

Semivolatiles
by EPA Method 8270

Sample ID	Analyte	Results	Blank Result	Reporting Limit	Units	Q	*Lab Number*
PART WASH SOLV #1	*LIQUID*		*MB0621AA*			Sampled: *06/14/00* Analyzed: *06/29/00*	*L16833-1*
CAS#							
108-95-2	Phenol	nd	nd	2000	mg/Kg	D1	
111-44-4	bis(2-Chloroethyl)ether	nd	nd	2000	mg/Kg	D1	
95-57-8	2-Chlorophenol	nd	nd	2000	mg/Kg	D1	
541-73-1	1,3-Dichlorobenzene	nd	nd	2000	mg/Kg	D1	
106-46-7	1,4-Dichlorobenzene	nd	nd	2000	mg/Kg	D1	
100-51-4	Benzyl alcohol	nd	nd	4000	mg/Kg	D1	
95-50-1	1,2-Dichlorobenzene	nd	nd	2000	mg/Kg	D1	
95-48-7	2-Methylphenol	nd	nd	2000	mg/Kg	D1	
108-60-1	bis(2-chloroisopropyl)ether	nd	nd	2000	mg/Kg	D1	
106-44-5	4-Methylphenol	nd	nd	2000	mg/Kg	D1	
621-64-7	N-Nitroso-di-n-propylamine	nd	nd	2000	mg/Kg	D1	
67-72-1	Hexachloroethane	nd	nd	2000	mg/Kg	D1	
98-95-3	Nitrobenzene	nd	nd	2000	mg/Kg	D1	
78-59-1	Isophorone	nd	nd	2000	mg/Kg	D1	
88-75-5	2-Nitrophenol	nd	nd	2000	mg/Kg	D1	
105-67-9	2,4-Dimethylphenol	nd	nd	2000	mg/Kg	D1	
65-85-0	Benzoic acid	nd	nd	10000	mg/Kg	D1	
111-91-1	bis(2-Chloroethoxy)methane	nd	nd	2000	mg/Kg	D1	
120-83-2	2,4-Dichlorophenol	nd	nd	2000	mg/Kg	D1	
120-82-1	1,2,4-Trichlorobenzene	nd	nd	2000	mg/Kg	D1	
91-20-3	**Naphthalene**	**3,250**	**nd**	**2000**	**mg/Kg**	**D1**	
106-47-8	4-Chloroaniline	nd	nd	4000	mg/Kg	D1	
87-68-3	Hexachlorobutadiene	nd	nd	2000	mg/Kg	D1	
59-50-7	4-Chloro-3-methylphenol	nd	nd	4000	mg/Kg	D1	
91-57-6	2-Methylnaphthalene	nd	nd	2000	mg/Kg	D1	
77-47-4	Hexachlorocyclopentadiene	nd	nd	2000	mg/Kg	D1	

none detected = nd

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Client: **Enron Transwestern Pipeline**
Contact: **Larry Campbell**

Project: **TWPG8, Roswell, Enron Transport & Storage**

Semivolatiles
by EPA Method 8270

Sample ID	Analyte	Results	Blank Result	Reporting Limit	Units	Q	*Lab Number*
PART WASH SOLV #1	*LIQUID*		*MB0621AA*			Sampled: *06/14/00* Analyzed: *06/29/00*	*L16833-1*
CAS#							
88-06-2	2,4,6-Trichlorophenol	nd	nd	2000	mg/Kg	D1	
95-95-4	2,4,5-Trichlorophenol	nd	nd	2000	mg/Kg	D1	
91-58-7	2-Chloronaphthalene	nd	nd	2000	mg/Kg	D1	
88-74-4	2-Nitroaniline	nd	nd	10000	mg/Kg	D1	
208-96-8	Acenaphthylene	nd	nd	2000	mg/Kg	D1	
131-11-3	Dimethylphthalate	nd	nd	2000	mg/Kg	D1	
606-20-2	2,6-Dinitrotoluene	nd	nd	2000	mg/Kg	D1	
83-32-9	Acenaphthene	nd	nd	2000	mg/Kg	D1	
99-09-2	3-Nitroaniline	nd	nd	10000	mg/Kg	D1	
51-28-5	2,4-Dinitrophenol	nd	nd	10000	mg/Kg	D1	
132-64-9	Dibenzofuran	nd	nd	2000	mg/Kg	D1	
121-14-2	2,4-Dinitrotoluene	nd	nd	2000	mg/Kg	D1	
100-02-7	4-Nitrophenol	nd	nd	10000	mg/Kg	D1	
86-73-7	Fluorene	nd	nd	2000	mg/Kg	D1	
7005-72-3	4-Chlorophenyl-phenylether	nd	nd	2000	mg/Kg	D1	
84-66-2	Diethylphthalate	nd	nd	2000	mg/Kg	D1	
100-01-6	4-Nitroaniline	nd	nd	10000	mg/Kg	D1	
122-66-7	1,2-Diphenylhydrazine	nd	nd	10000	mg/Kg	D1	
534-52-1	4,6-Dinitro-2-methylphenol	nd	nd	10000	mg/Kg	D1	
86-30-6	n-Nitrosodiphenylamine	nd	nd	2000	mg/Kg	D1	
101-55-3	4-Bromophenyl-phenylether	nd	nd	2000	mg/Kg	D1	
118-74-1	Hexachlorobenzene	nd	nd	2000	mg/Kg	D1	
87-86-5	Pentachlorophenol	nd	nd	10000	mg/Kg	D1	
85-01-8	Phenanthrene	nd	nd	2000	mg/Kg	D1	
120-12-7	Anthracene	nd	nd	2000	mg/Kg	D1	
84-74-2	Di-n-butylphthalate	nd	nd	2000	mg/Kg	D1	

none detected = nd

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OAL

L16833

Client: **Enron Transwestern Pipeline**
Contact: **Larry Campbell**

Project: **TWPG8, Roswell, Enron Transport & Storage**

Semivolatiles
by EPA Method 8270

Sample ID	Analyte	Results	Blank Result	Reporting Limit	Units	Q	*Lab Number*
PART WASH SOLV #1	*LIQUID*		*MB0621AA*			Sampled: *06/14/00* Analyzed: *06/29/00*	*L16833-1*
CAS#							
206-44-0	Fluoranthene	nd	nd	2000	mg/Kg	D1	
129-00-0	Pyrene	nd	nd	2000	mg/Kg	D1	
85-68-7	Butylbenzylphthalate	nd	nd	2000	mg/Kg	D1	
91-94-1	3,3'-Dichlorobenzidine	nd	nd	4000	mg/Kg	D1	
56-55-3	Benzo[a]anthracene	nd	nd	2000	mg/Kg	D1	
218-01-9	Chrysene	nd	nd	2000	mg/Kg	D1	
117-81-7	bis(2-Ethylhexyl)phthalate	nd	nd	2000	mg/Kg	D1	
205-99-2	Benzo[b]fluoranthene	nd	nd	2000	mg/Kg	D1	
205-99-2	Benzo[b]fluoranthene	nd	nd	2000	mg/Kg	D1	
207-08-9	Benzo[k]fluoranthene	nd	nd	2000	mg/Kg	D1	
50-32-8	Benzo[a]pyrene	nd	nd	2000	mg/Kg	D1	
193-39-5	Indeno[1,2,3-cd]pyrene	nd	nd	2000	mg/Kg	D1	
53-70-3	Dibenz[a,h]anthracene	nd	nd	2000	mg/Kg	D1	
191-24-2	Benzo[g,h,i]perylene	nd	nd	2000	mg/Kg	D1	

	Recovery	Recovery	Control	Q
Acid Surrogates:	*L16833-1*	*MB0621AA*	Limits (%)	
2-Fluorophenol	110	110	10 - 200	
Phenol-d6	86	114	10 - 200	
2,4,6-Tribromophenol	65	90	10 - 200	
Base / Neutral Surrogates:				
1,2-Dichlorobenzene d-4	100	97	10 - 200	
Nitrobenzene-d5	87	112	10 - 200	
2-Fluorobiphenyl	76	101	10 - 200	

none detected = nd

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OAL

L16833

Client: **Enron Transwestern Pipeline**
Contact: **Larry Campbell**

Project: **TWPG8, Roswell, Enron Transport & Storage**

Semivolatiles
by EPA Method 8270

Sample ID	Analyte	Results	Blank Result	Reporting Limit	Units	Q	*Lab Number*
PART WASH SOLV #2	*LIQUID*		*MB0621AA*			Sampled: *06/14/00* Analyzed: *06/29/00*	*L16833-2*
CAS#							
108-95-2	Phenol	nd	nd	2000	mg/Kg	D1	
111-44-4	bis(2-Chloroethyl)ether	nd	nd	2000	mg/Kg	D1	
95-57-8	2-Chlorophenol	nd	nd	2000	mg/Kg	D1	
541-73-1	1,3-Dichlorobenzene	nd	nd	2000	mg/Kg	D1	
106-46-7	1,4-Dichlorobenzene	nd	nd	2000	mg/Kg	D1	
100-51-4	Benzyl alcohol	nd	nd	4000	mg/Kg	D1	
95-50-1	1,2-Dichlorobenzene	nd	nd	2000	mg/Kg	D1	
95-48-7	2-Methylphenol	nd	nd	2000	mg/Kg	D1	
108-60-1	bis(2-chloroisopropyl)ether	nd	nd	2000	mg/Kg	D1	
106-44-5	4-Methylphenol	nd	nd	2000	mg/Kg	D1	
621-64-7	N-Nitroso-di-n-propylamine	nd	nd	2000	mg/Kg	D1	
67-72-1	Hexachloroethane	nd	nd	2000	mg/Kg	D1	
98-95-3	Nitrobenzene	nd	nd	2000	mg/Kg	D1	
78-59-1	Isophorone	nd	nd	2000	mg/Kg	D1	
88-75-5	2-Nitrophenol	nd	nd	2000	mg/Kg	D1	
105-67-9	2,4-Dimethylphenol	nd	nd	2000	mg/Kg	D1	
65-85-0	Benzoic acid	nd	nd	10000	mg/Kg	D1	
111-91-1	bis(2-Chloroethoxy)methane	nd	nd	2000	mg/Kg	D1	
120-83-2	2,4-Dichlorophenol	nd	nd	2000	mg/Kg	D1	
120-82-1	1,2,4-Trichlorobenzene	nd	nd	2000	mg/Kg	D1	
91-20-3	**Naphthalene**	**3,090**	**nd**	**2000**	**mg/Kg**	**D1**	
106-47-8	4-Chloroaniline	nd	nd	4000	mg/Kg	D1	
87-68-3	Hexachlorobutadiene	nd	nd	2000	mg/Kg	D1	
59-50-7	4-Chloro-3-methylphenol	nd	nd	4000	mg/Kg	D1	
91-57-6	2-Methylnaphthalene	nd	nd	2000	mg/Kg	D1	
77-47-4	Hexachlorocyclopentadiene	nd	nd	2000	mg/Kg	D1	

none detected = nd

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L16833

Client: **Enron Transwestern Pipeline**
Contact: **Larry Campbell**

Project: **TWPG8, Roswell, Enron Transport & Storage**

Semivolatiles
by EPA Method 8270

Sample ID	Analyte	Results	Blank Result	Reporting Limit	Units	Q	*Lab Number*
PART WASH SOLV #2	*LIQUID*		*MB0621AA*			Sampled: *06/14/00* Analyzed: *06/29/00*	*L16833-2*
CAS#							
88-06-2	2,4,6-Trichlorophenol	nd	nd	2000	mg/Kg	D1	
95-95-4	2,4,5-Trichlorophenol	nd	nd	2000	mg/Kg	D1	
91-58-7	2-Chloronaphthalene	nd	nd	2000	mg/Kg	D1	
88-74-4	2-Nitroaniline	nd	nd	10000	mg/Kg	D1	
208-96-8	Acenaphthylene	nd	nd	2000	mg/Kg	D1	
131-11-3	Dimethylphthalate	nd	nd	2000	mg/Kg	D1	
606-20-2	2,6-Dinitrotoluene	nd	nd	2000	mg/Kg	D1	
83-32-9	Acenaphthene	nd	nd	2000	mg/Kg	D1	
99-09-2	3-Nitroaniline	nd	nd	10000	mg/Kg	D1	
51-28-5	2,4-Dinitrophenol	nd	nd	10000	mg/Kg	D1	
132-64-9	Dibenzofuran	nd	nd	2000	mg/Kg	D1	
121-14-2	2,4-Dinitrotoluene	nd	nd	2000	mg/Kg	D1	
100-02-7	4-Nitrophenol	nd	nd	10000	mg/Kg	D1	
86-73-7	Fluorene	nd	nd	2000	mg/Kg	D1	
7005-72-3	4-Chlorophenyl-phenylether	nd	nd	2000	mg/Kg	D1	
84-66-2	Diethylphthalate	nd	nd	2000	mg/Kg	D1	
100-01-6	4-Nitroaniline	nd	nd	10000	mg/Kg	D1	
122-66-7	1,2-Diphenylhydrazine	nd	nd	10000	mg/Kg	D1	
534-52-1	4,6-Dinitro-2-methylphenol	nd	nd	10000	mg/Kg	D1	
86-30-6	n-Nitrosodiphenylamine	nd	nd	2000	mg/Kg	D1	
101-55-3	4-Bromophenyl-phenylether	nd	nd	2000	mg/Kg	D1	
118-74-1	Hexachlorobenzene	nd	nd	2000	mg/Kg	D1	
87-86-5	Pentachlorophenol	nd	nd	10000	mg/Kg	D1	
85-01-8	Phenanthrene	nd	nd	2000	mg/Kg	D1	
120-12-7	Anthracene	nd	nd	2000	mg/Kg	D1	
84-74-2	Di-n-butylphthalate	nd	nd	2000	mg/Kg	D1	

none detected = nd

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L16833

Client: **Enron Transwestern Pipeline**
Contact: **Larry Campbell**

Project: **TWPG8, Roswell, Enron Transport & Storage**

Semivolatiles
by EPA Method 8270

Sample ID	Analyte	Results	Blank Result	Reporting Limit	Units	Q	*Lab Number*
PART WASH SOLV #2	*LIQUID*		*MB0621AA*			Sampled: *06/14/00* Analyzed: *06/29/00*	*L16833-2*
CAS#							
206-44-0	Fluoranthene	nd	nd	2000	mg/Kg	D1	
129-00-0	Pyrene	nd	nd	2000	mg/Kg	D1	
85-68-7	Butylbenzylphthalate	nd	nd	2000	mg/Kg	D1	
91-94-1	3,3'-Dichlorobenzidine	nd	nd	4000	mg/Kg	D1	
56-55-3	Benzo[a]anthracene	nd	nd	2000	mg/Kg	D1	
218-01-9	Chrysene	nd	nd	2000	mg/Kg	D1	
117-81-7	bis(2-Ethylhexyl)phthalate	nd	nd	2000	mg/Kg	D1	
205-99-2	Benzo[b]fluoranthene	nd	nd	2000	mg/Kg	D1	
205-99-2	Benzo[b]fluoranthene	nd	nd	2000	mg/Kg	D1	
207-08-9	Benzo[k]fluoranthene	nd	nd	2000	mg/Kg	D1	
50-32-8	Benzo[a]pyrene	nd	nd	2000	mg/Kg	D1	
193-39-5	Indeno[1,2,3-cd]pyrene	nd	nd	2000	mg/Kg	D1	
53-70-3	Dibenz[a,h]anthracene	nd	nd	2000	mg/Kg	D1	
191-24-2	Benzo[g,h,i]perylene	nd	nd	2000	mg/Kg	D1	

	Recovery *L16833-2*	Recovery *MB0621AA*	Control Limits (%)	Q
Acid Surrogates:				
2-Fluorophenol	105	110	10 - 200	
Phenol-d6	79	114	10 - 200	
2,4,6-Tribromophenol	62	90	10 - 200	
Base / Neutral Surrogates:				
1,2-Dichlorobenzene d-4	93	97	10 - 200	
Nitrobenzene-d5	80	112	10 - 200	
2-Fluorobiphenyl	74	101	10 - 200	

none detected = nd

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L16833

Client: *Enron Transwestern Pipeline*
Contact: *Larry Campbell*

Project: *TWPG8, Roswell, Enron Transport & Storage*

Volatile Organic Compounds (VOC)
by EPA 8260

Sample ID	*Matrix*						*Lab Number*
CAS	Analyte	Result	Reporting Limit	Units	Dilution	Comment	
PART WASH SOLV #1	*other (liquid)*			Sampled: *6/14/2000* Extracted: *6/21/2000* Analyzed: *6/29/2000 by GC*			*L16833-1*
	See Attached Data Sheet						
PART WASH SOLV #2	*other (liquid)*			Sampled: *6/14/2000* Extracted: *6/21/2000* Analyzed: *6/22/2000 by GC*			*L16833-2*
	See Attached Data Sheet						

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L16833

Client: **Enron Transwestern Pipeline**
Contact: **Larry Campbell**

Project: **TWPG8, Roswell, Enron Transport & Storage**

Volatiles
by EPA Method 8260

Sample ID	Analyte	Result	Blank Result	Reporting Limit	Units	Comment	*Lab Number*
PART WASH SOLV #1	*Liquid*		*MB0616J*			Sampled : *06/14/00* Analyzed : *06/29/00*	*L16833-1*
CAS #							
75-71-8	Dichlorodifluoromethane	nd	nd	100	mg/Kg		
74-87-3	Chloromethane	nd	nd	100	mg/Kg		
75-01-4	Vinyl chloride	nd	nd	100	mg/Kg		
74-83-9	Bromomethane	nd	nd	100	mg/Kg		
75-00-3	Chloroethane	nd	nd	100	mg/Kg		
75-69-4	Trichlorofluoromethane	nd	nd	100	mg/Kg		
67-64-1	Acetone	nd	nd	1000	mg/Kg		
75-35-4	1,1-Dichloroethene	nd	nd	50	mg/Kg		
75-09-2	Methylene chloride	nd	nd	100	mg/Kg		
75-15-0	Carbon disulfide	nd	nd	50	mg/Kg		
156-60-5	trans-1,2-Dichloroethene	nd	nd	50	mg/Kg		
75-34-3	1,1-Dichloroethane	nd	nd	50	mg/Kg		
78-93-3	2-Butanone	nd	nd	1000	mg/Kg		
590-20-7	2,2-Dichloropropane	nd	nd	50	mg/Kg		
156-59-4	cis-1,2-Dichloroethene	nd	nd	50	mg/Kg		
74-97-5	Bromochloromethane	nd	nd	50	mg/Kg		
67-66-3	Chloroform	nd	nd	50	mg/Kg		
71-55-6	1,1,1-Trichloroethane	nd	nd	50	mg/Kg		
56-23-5	Carbon tetrachloride	nd	nd	50	mg/Kg		
563-58-6	1,1-Dichloropropene	nd	nd	50	mg/Kg		
71-43-2	Benzene	nd	nd	50	mg/Kg		
107-06-2	1,2-Dichloroethane	nd	nd	50	mg/Kg		
79-01-6	Trichloroethene	nd	nd	50	mg/Kg		

none detected = nd

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Client: **Enron Transwestern Pipeline**
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Project: **TWPG8, Roswell, Enron Transport & Storage**

Volatiles
by EPA Method 8260

Sample ID	Analyte	Result	Blank Result	Reporting Limit	Units	Comment	*Lab Number*
PART WASH SOLV #1	*Liquid*		*MB0616J*			Sampled : *06/14/00* Analyzed : *06/29/00*	*L16833-1*
CAS #							
78-87-5	1,2-Dichloropropane	nd	nd	50	mg/Kg		
74-95-3	Dibromomethane	nd	nd	50	mg/Kg		
75-27-4	Bromodichloromethane	nd	nd	50	mg/Kg		
10061-01-5	cis-1,3-Dichloropropene	nd	nd	50	mg/Kg		
108-10-1	4-Methyl-2-pentanone	nd	nd	500	mg/Kg		
108-88-3	Toluene	nd	nd	50	mg/Kg		
591-78-6	2-Hexanone	nd	nd	500	mg/Kg		
10061-02-6	trans-1,3-Dichloropropene	nd	nd	50	mg/Kg		
79-00-5	1,1,2-Trichloroethane	nd	nd	50	mg/Kg		
127-18-4	Tetrachloroethene	nd	nd	50	mg/Kg		
542-75-6	1,3-Dichloropropane	nd	nd	50	mg/Kg		
124-48-1	Dibromochloromethane	nd	nd	50	mg/Kg		
106-93-4	1,2-Dibromoethane	nd	nd	50	mg/Kg		
108-90-7	Chlorobenzene	nd	nd	50	mg/Kg		
630-20-6	1,1,1,2-Tetrachloroethane	nd	nd	50	mg/Kg		
100-41-4	Ethylbenzene	nd	nd	50	mg/Kg		
100-42-5	Styrene	nd	nd	50	mg/Kg		
75-25-2	Bromoform	nd	nd	50	mg/Kg		
98-82-8	Isopropylbenzene	nd	nd	50	mg/Kg		
108-86-1	Bromobenzene	nd	nd	50	mg/Kg		
79-34-5	1,1,2,2-Tetrachloroethane	nd	nd	75	mg/Kg	I2	
96-18-4	1,2,3-Trichloropropane	nd	nd	50	mg/Kg		
103-65-1	n-Propylbenzene	nd	nd	50	mg/Kg		

none detected = nd

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Client: **Enron Transwestern Pipeline**
Contact: **Larry Campbell**

Project: **TWPG8, Roswell, Enron Transport & Storage**

Volatiles
by EPA Method 8260

Sample ID	Analyte	Result	Blank Result	Reporting Limit	Units	Comment	*Lab Number*

Sampled : *06/14/00*
Analyzed : *06/29/00*

PART WASH SOLV #1 *Liquid* *MB0616J* *L16833-1*

CAS #						
95-49-8	2-Chlorotoluene	nd	nd	50	mg/Kg	
106-43-4	4-Chlorotoluene	nd	nd	50	mg/Kg	
108-67-8	1,3,5-Trimethylbenzene	nd	nd	50	mg/Kg	
98-06-6	tert-Butylbenzene	nd	nd	50	mg/Kg	
95-63-6	**1,2,4-Trimethylbenzene**	**120**	**nd**	**50**	**mg/Kg**	
135-98-8	sec-Butylbenzene	nd	nd	50	mg/Kg	
541-73-1	1,3-Dichlorobenzene	nd	nd	50	mg/Kg	
99-87-6	4-Isopropyltoluene	nd	nd	325	mg/Kg	I2
106-46-7	1,4-Dichlorobenzene	nd	nd	50	mg/Kg	
95-50-1	1,2-Dichlorobenzene	nd	nd	50	mg/Kg	
104-51-8	n-Butylbenzene	nd	nd	375	mg/Kg	I2
96-12-8	1,2-Dibromo-3-chloropropane	nd	nd	625	mg/Kg	I2
120-82-1	1,2,4-Trichlorobenzene	nd	nd	50	mg/Kg	
87-68-3	Hexachlorobutadiene	nd	nd	50	mg/Kg	
91-20-3	**Naphthalene**	**3,900**	**nd**	**500**	**mg/Kg**	**D**
87-61-6	1,2,3-Trichlorobenzene	nd	nd	50	mg/Kg	
	Total Xylenes	nd	nd	50	mg/Kg	

Surrogates	Recovery *L16833-1*	Recovery *MB0616J*
1,2-Dichloroethane-d4	100%	101%
Toluene-d8	93%	109%
4-Bromofluorobenzene	97%	104%

none detected = nd

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L16833

Client: **Enron Transwestern Pipeline**
Contact: **Larry Campbell**

Project: **TWPG8, Roswell, Enron Transport & Storage**

Volatiles
by EPA Method 8260

Sample ID	Analyte	Result	Blank Result	Reporting Limit	Units	Comment	*Lab Number*

PART WASH SOLV #2 *Liquid* *MB0616J* Sampled : *06/14/00* Analyzed : *06/22/00* *L16833-2*

CAS #						
75-71-8	Dichlorodifluoromethane	nd	nd	100	mg/Kg	
74-87-3	Chloromethane	nd	nd	100	mg/Kg	
75-01-4	Vinyl chloride	nd	nd	100	mg/Kg	
74-83-9	Bromomethane	nd	nd	100	mg/Kg	
75-00-3	Chloroethane	nd	nd	100	mg/Kg	
75-69-4	Trichlorofluoromethane	nd	nd	100	mg/Kg	
67-64-1	Acetone	nd	nd	1000	mg/Kg	
75-35-4	1,1-Dichloroethene	nd	nd	50	mg/Kg	
75-09-2	Methylene chloride	nd	nd	100	mg/Kg	
75-15-0	Carbon disulfide	nd	nd	50	mg/Kg	
156-60-5	trans-1,2-Dichloroethene	nd	nd	50	mg/Kg	
75-34-3	1,1-Dichloroethane	nd	nd	50	mg/Kg	
78-93-3	2-Butanone	nd	nd	1000	mg/Kg	
590-20-7	2,2-Dichloropropane	nd	nd	50	mg/Kg	
156-59-4	cis-1,2-Dichloroethene	nd	nd	50	mg/Kg	
74-97-5	Bromochloromethane	nd	nd	50	mg/Kg	
67-66-3	Chloroform	nd	nd	50	mg/Kg	
71-55-6	1,1,1-Trichloroethane	nd	nd	50	mg/Kg	
56-23-5	Carbon tetrachloride	nd	nd	50	mg/Kg	
563-58-6	1,1-Dichloropropene	nd	nd	50	mg/Kg	
71-43-2	Benzene	nd	nd	50	mg/Kg	
107-06-2	1,2-Dichloroethane	nd	nd	50	mg/Kg	
79-01-6	Trichloroethene	nd	nd	50	mg/Kg	

none detected = nd
Reporting limit was raised due to matrix interference = I2

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L16833

Client: **Enron Transwestern Pipeline**
Contact: **Larry Campbell**

Project: **TWPG8, Roswell, Enron Transport & Storage**

Volatiles
by EPA Method 8260

Sample ID	Analyte	Result	Blank Result	Reporting Limit	Units	Comment	*Lab Number*
PART WASH SOLV #2	*Liquid*		*MB0616J*			Sampled : *06/14/00* Analyzed : *06/22/00*	*L16833-2*
CAS #							
78-87-5	1,2-Dichloropropane	nd	nd	50	mg/Kg		
74-95-3	Dibromomethane	nd	nd	50	mg/Kg		
75-27-4	Bromodichloromethane	nd	nd	50	mg/Kg		
10061-01-5	cis-1,3-Dichloropropene	nd	nd	50	mg/Kg		
108-10-1	4-Methyl-2-pentanone	nd	nd	500	mg/Kg		
108-88-3	Toluene	nd	nd	50	mg/Kg		
591-78-6	2-Hexanone	nd	nd	500	mg/Kg		
10061-02-6	trans-1,3-Dichloropropene	nd	nd	50	mg/Kg		
79-00-5	1,1,2-Trichloroethane	nd	nd	50	mg/Kg		
127-18-4	Tetrachloroethene	nd	nd	50	mg/Kg		
542-75-6	1,3-Dichloropropane	nd	nd	50	mg/Kg		
124-48-1	Dibromochloromethane	nd	nd	50	mg/Kg		
106-93-4	1,2-Dibromoethane	nd	nd	50	mg/Kg		
108-90-7	Chlorobenzene	nd	nd	50	mg/Kg		
630-20-6	1,1,1,2-Tetrachloroethane	nd	nd	50	mg/Kg		
100-41-4	Ethylbenzene	nd	nd	50	mg/Kg		
100-42-5	Styrene	nd	nd	50	mg/Kg		
75-25-2	Bromoform	nd	nd	50	mg/Kg		
98-82-8	Isopropylbenzene	nd	nd	50	mg/Kg		
108-86-1	Bromobenzene	nd	nd	50	mg/Kg		
79-34-5	1,1,2,2-Tetrachloroethane	nd	nd	50	mg/Kg		
96-18-4	1,2,3-Trichloropropane	nd	nd	50	mg/Kg		
103-65-1	n-Propylbenzene	nd	nd	50	mg/Kg		

none detected = nd
Reporting limit was raised due to matrix interference = I2

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L16833

Client: **Enron Transwestern Pipeline**
Contact: **Larry Campbell**

Project: **TWPG8, Roswell, Enron Transport & Storage**

Volatiles
by EPA Method 8260

Sample ID	Analyte	Result	Blank Result	Reporting Limit	Units	Comment	*Lab Number*
PART WASH SOLV #2	*Liquid*		*MB0616J*			Sampled : *06/14/00* Analyzed : *06/22/00*	*L16833-2*
CAS #							
95-49-8	2-Chlorotoluene	nd	nd	50	mg/Kg		
106-43-4	4-Chlorotoluene	nd	nd	50	mg/Kg		
108-67-8	1,3,5-Trimethylbenzene	nd	nd	50	mg/Kg		
98-06-6	tert-Butylbenzene	nd	nd	50	mg/Kg		
95-63-6	**1,2,4-Trimethylbenzene**	**110**	**nd**	**50**	**mg/Kg**		
135-98-8	sec-Butylbenzene	nd	nd	50	mg/Kg		
541-73-1	1,3-Dichlorobenzene	nd	nd	50	mg/Kg		
99-87-6	4-Isopropyltoluene	nd	nd	300	mg/Kg	I2	
106-46-7	1,4-Dichlorobenzene	nd	nd	50	mg/Kg		
95-50-1	1,2-Dichlorobenzene	nd	nd	50	mg/Kg		
104-51-8	n-Butylbenzene	nd	nd	400	mg/Kg	I2	
96-12-8	1,2-Dibromo-3-chloropropane	nd	nd	505	mg/Kg	I2	
120-82-1	1,2,4-Trichlorobenzene	nd	nd	50	mg/Kg		
87-68-3	Hexachlorobutadiene	nd	nd	50	mg/Kg		
91-20-3	**Naphthalene**	**2,100**	**nd**	**50**	**mg/Kg**		
87-61-6	1,2,3-Trichlorobenzene	nd	nd	50	mg/Kg		
	Total Xylenes	nd	nd	50	mg/Kg		

Surrogates	Recovery *L16833-2*	Recovery *MB0616J*
1,2-Dichloroethane-d4	103%	101%
Toluene-d8	99%	109%
4-Bromofluorobenzene	98%	104%

none detected = nd
Reporting limit was raised due to matrix interference = I2

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Chain of Custody Record
Laboratory Analysis Request

Sampling: ☐ Grab ☐ Comp Page ____ of ____
OAL Hours ____ Site Visit ☐
ISCO ____
www.oalab.com

Client Information
Company: TRANSWestern Pipe
Contact: RAYMOND HOLLON
Address: 6381 N. main
ROSWELL, N.M. 88201
Phone # 505-625-8059 Fax # 505-625-8089

Billing Information
Company: same
Contact: Larry CampBell
Address: ____
Phone # 505-625-8022 Fax # ____

Project Information
Project Name: ____
Project #: ____
P.O. #: ____
Comments: ____

Sampler's Name: RAYMOND HOLLON
Signature: Raymond Hollon

Quote #: ____
NOTE: If quote number is not referenced, standard pricing will be applied.
Provide Fax Results ☐ Yes ☐ No

Remarks: SENT RESULTS TO Larry CampBell AT Same Address AS ABOVE. ALSO TO BUTCH RUSSELL AT SUMMIT OFFICE Bld. SUITE 250 4001 INDIAN SCHOOL Road N.E. ALB. N.M. 87110

	Sample Identification	Date	Time	FOR LAB USE ONLY OAL Login #	# of Containers	Matrix: Soil	Matrix: Water	Matrix: Other (Note in Remarks)	Volatiles 620 / 8260 / 8240 8010 / 8020	Semivolatiles 625 / 8270 PAH(SIM)8270 PAH8310	Organochlor Pest 608 / 8081 PCB 608 / 8082	NW TPH-HCID Quantify? ☐ Yes ☐ No	NW TPH Quantification G X DX/OIL	BTEX 602 / 8021 ☐ MTBE ☐ Naphthalene	Metals ☐ Total ☒ TCLP ☐ Dissolved As Ba Cd Cr Pb Hg Se Ag Other ____	Turnaround	Remarks
1	SOLVENT From	6/14/00	11:00	L16833-1	1				✓	✓							
2	Part Washer	6/14/00	11:00	↓ -2	1				✓	✓							ID # 1 Liquids
3	" "				1				✓	✓							ID # 2 " "
4																	
5																	
6																	
7																	
8																	
9																	

Turnaround:
[N] Normal – 10 working days
[S] Special – 5 working days
[R] Rush – 24-72 hrs
[O] Other – ____

Relinquished
Signature: Raymond Hollon Date: 6/14/00
Print Name: RAYMOND HOLLON Time: 1310
Company: TRANSWestern Pipe

Received
Signature: UPS Date: 6/14/10
Print Name: UPS Time: 1355
Company: ____

Relinquished
Signature: ____ Date: ____
Print Name: ____ Time: ____
Company: ____

Received
Signature: [illegible] Date: 6/20/00
Print Name: Doug McKenzie Time: 1145
Company: OAL

Relinquished
Signature: ____ Date: ____
Print Name: ____ Time: ____
Company: ____

Received
Signature: ____ Date: ____
Print Name: ____ Time: ____
Company: ____

☐ Courier ☒ UPS ☐ FedEx ☐ Other
Received @ 21 °C
Appropriate Containers ☒ Yes ☒ No
____ 4oz./8oz. Jars
____ VOA Vials
1 Plastic Bottles 125mL
____ Glass Bottles
1 Other 125mL Tin

PGE 71982 (Oct 99)

WASTE: 01 oil/wastewater

Hall Environmental Analysis Laboratory

Date: *12-May-06*

CLIENT:	Transwestern Pipeline NDL Station	**Client Sample ID:**	Waste Oil East
Lab Order:	0604249	**Collection Date:**	4/25/2006 12:00:00 PM
Project:	Roswell C/S #9	**Date Received:**	4/26/2006
Lab ID:	0604249-01	**Matrix:**	OIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
SEMIVOLATILE ORGANICS BY 8270C						Analyst: BL
2,4-Dinitrotoluene	ND	0.13		mg/Kg	5	5/9/2006
Hexachlorobenzene	ND	0.13		mg/Kg	5	5/9/2006
Hexachlorobutadiene	ND	0.50		mg/Kg	5	5/9/2006
Hexachloroethane	ND	3.0		mg/Kg	5	5/9/2006
2-Methylphenol	ND	200		mg/Kg	5	5/9/2006
3+4-Methylphenol	ND	200		mg/Kg	5	5/9/2006
Nitrobenzene	ND	2.0		mg/Kg	5	5/9/2006
Pentachlorophenol	ND	100		mg/Kg	5	5/9/2006
Pyridine	ND	5.0		mg/Kg	5	5/9/2006
2,4,5-Trichlorophenol	ND	400		mg/Kg	5	5/9/2006
2,4,6-Trichlorophenol	ND	10		mg/Kg	5	5/9/2006
Surr: 2,4,6-Tribromophenol	76.1	26-156		%REC	5	5/9/2006
Surr: 2-Fluorobiphenyl	100	23.6-111		%REC	5	5/9/2006
Surr: 2-Fluorophenol	95.3	21.5-107		%REC	5	5/9/2006
Surr: 4-Terphenyl-d14	72.0	70-130		%REC	5	5/9/2006
Surr: Nitrobenzene-d5	89.7	25.3-115		%REC	5	5/9/2006
Surr: Phenol-d5	92.3	25.2-115		%REC	5	5/9/2006
EPA METHOD 8260B: VOLATILES						Analyst: KTM
Benzene	ND	0.48		mg/Kg	1	5/1/2006
1,2-Dichloroethane (EDC)	ND	0.48		mg/Kg	1	5/1/2006
2-Butanone	ND	9.5		mg/Kg	1	5/1/2006
Carbon Tetrachloride	ND	0.48		mg/Kg	1	5/1/2006
Chlorobenzene	ND	95		mg/Kg	1	5/1/2006
Chloroform	ND	5.7		mg/Kg	1	5/1/2006
1,4-Dichlorobenzene	ND	7.1		mg/Kg	1	5/1/2006
1,1-Dichloroethene	ND	0.67		mg/Kg	1	5/1/2006
Hexachlorobutadiene	ND	0.48		mg/Kg	1	5/1/2006
Tetrachloroethene (PCE)	ND	0.67		mg/Kg	1	5/1/2006
Trichloroethene (TCE)	ND	0.48		mg/Kg	1	5/1/2006
Vinyl chloride	ND	0.19		mg/Kg	1	5/1/2006
Surr: 1,2-Dichloroethane-d4	102	59.1-130		%REC	1	5/1/2006
Surr: 4-Bromofluorobenzene	107	92.1-112		%REC	1	5/1/2006
Surr: Dibromofluoromethane	111	76.6-130		%REC	1	5/1/2006
Surr: Toluene-d8	96.5	81.8-118		%REC	1	5/1/2006

Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Value above quantitation range
- J Analyte detected below quantitation limits
- S Spike Recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit

Hall Environmental Analysis Laboratory

Date: *12-May-06*

CLIENT:	Transwestern Pipeline NDL Station	**Client Sample ID:**	Waste Oil West
Lab Order:	0604249	**Collection Date:**	4/25/2006 12:30:00 PM
Project:	Roswell C/S #9	**Date Received:**	4/26/2006
Lab ID:	0604249-02	**Matrix:**	OIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
SEMIVOLATILE ORGANICS BY 8270C						Analyst: BL
2,4-Dinitrotoluene	ND	0.13		mg/Kg	5	5/9/2006
Hexachlorobenzene	ND	0.13		mg/Kg	5	5/9/2006
Hexachlorobutadiene	ND	0.50		mg/Kg	5	5/9/2006
Hexachloroethane	ND	3.0		mg/Kg	5	5/9/2006
2-Methylphenol	ND	200		mg/Kg	5	5/9/2006
3+4-Methylphenol	ND	200		mg/Kg	5	5/9/2006
Nitrobenzene	ND	2.0		mg/Kg	5	5/9/2006
Pentachlorophenol	ND	100		mg/Kg	5	5/9/2006
Pyridine	ND	5.0		mg/Kg	5	5/9/2006
2,4,5-Trichlorophenol	ND	400		mg/Kg	5	5/9/2006
2,4,6-Trichlorophenol	ND	10		mg/Kg	5	5/9/2006
Surr: 2,4,6-Tribromophenol	81.0	26-156		%REC	5	5/9/2006
Surr: 2-Fluorobiphenyl	105	23.6-111		%REC	5	5/9/2006
Surr: 2-Fluorophenol	93.8	21.5-107		%REC	5	5/9/2006
Surr: 4-Terphenyl-d14	70.9	70-130		%REC	5	5/9/2006
Surr: Nitrobenzene-d5	94.2	25.3-115		%REC	5	5/9/2006
Surr: Phenol-d5	94.1	25.2-115		%REC	5	5/9/2006
EPA METHOD 8260B: VOLATILES						Analyst: KTM
Benzene	ND	0.47		mg/Kg	1	5/1/2006
1,2-Dichloroethane (EDC)	ND	0.47		mg/Kg	1	5/1/2006
2-Butanone	ND	9.5		mg/Kg	1	5/1/2006
Carbon Tetrachloride	ND	0.47		mg/Kg	1	5/1/2006
Chlorobenzene	ND	95		mg/Kg	1	5/1/2006
Chloroform	ND	5.7		mg/Kg	1	5/1/2006
1,4-Dichlorobenzene	ND	7.1		mg/Kg	1	5/1/2006
1,1-Dichloroethene	ND	0.66		mg/Kg	1	5/1/2006
Hexachlorobutadiene	ND	0.47		mg/Kg	1	5/1/2006
Tetrachloroethene (PCE)	ND	0.66		mg/Kg	1	5/1/2006
Trichloroethene (TCE)	ND	0.47		mg/Kg	1	5/1/2006
Vinyl chloride	ND	0.19		mg/Kg	1	5/1/2006
Surr: 1,2-Dichloroethane-d4	102	59.1-130		%REC	1	5/1/2006
Surr: 4-Bromofluorobenzene	92.9	92.1-112		%REC	1	5/1/2006
Surr: Dibromofluoromethane	107	76.6-130		%REC	1	5/1/2006
Surr: Toluene-d8	96.6	81.8-118		%REC	1	5/1/2006

Qualifiers:

- * Value exceeds Maximum Contaminant Level
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- H Holding times for preparation or analysis exceeded
- J Analyte detected below quantitation limits
- ND Not Detected at the Reporting Limit
- S Spike Recovery outside accepted recovery limits

Hall Environmental Analysis Laboratory

Date: *12-May-06*

CLIENT:	Transwestern Pipeline NDL Station	**Client Sample ID:**	PC 500
Lab Order:	0604249	**Collection Date:**	4/25/2006 1:00:00 PM
Project:	Roswell C/S #9	**Date Received:**	4/26/2006
Lab ID:	0604249-03	**Matrix:**	OIL

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
SEMIVOLATILE ORGANICS BY 8270C						Analyst: BL
Benzyl alcohol	ND	0.13		mg/Kg	5	5/9/2006
4,6-Dinitro-2-methylphenol	ND	0.13		mg/Kg	5	5/9/2006
2,4-Dinitrotoluene	ND	0.50		mg/Kg	5	5/9/2006
Hexachlorobenzene	ND	3.0		mg/Kg	5	5/9/2006
Hexachlorobutadiene	ND	200		mg/Kg	5	5/9/2006
Hexachloroethane	ND	200		mg/Kg	5	5/9/2006
2-Methylphenol	ND	2.0		mg/Kg	5	5/9/2006
3+4-Methylphenol	ND	100		mg/Kg	5	5/9/2006
Nitrobenzene	ND	5.0		mg/Kg	5	5/9/2006
Pentachlorophenol	ND	400		mg/Kg	5	5/9/2006
Pyridine	ND	10		mg/Kg	5	5/9/2006
2,4,5-Trichlorophenol	ND	0		mg/Kg	5	5/9/2006
2,4,6-Trichlorophenol	ND	0		mg/Kg	5	5/9/2006
Surr: 2,4,6-Tribromophenol	73.5	26-156		%REC	5	5/9/2006
Surr: 2-Fluorobiphenyl	107	23.6-111		%REC	5	5/9/2006
Surr: 2-Fluorophenol	102	21.5-107		%REC	5	5/9/2006
Surr: 4-Terphenyl-d14	76.6	70-130		%REC	5	5/9/2006
Surr: Nitrobenzene-d5	98.9	25.3-115		%REC	5	5/9/2006
Surr: Phenol-d5	97.1	25.2-115		%REC	5	5/9/2006
EPA METHOD 8260B: VOLATILES						Analyst: KTM
Benzene	ND	0.49		mg/Kg	1	4/29/2006
1,2-Dichloroethane (EDC)	ND	0.49		mg/Kg	1	4/29/2006
2-Butanone	ND	9.8		mg/Kg	1	4/29/2006
Carbon Tetrachloride	ND	0.49		mg/Kg	1	4/29/2006
Chlorobenzene	ND	98		mg/Kg	1	4/29/2006
Chloroform	ND	5.9		mg/Kg	1	4/29/2006
1,4-Dichlorobenzene	ND	7.3		mg/Kg	1	4/29/2006
1,1-Dichloroethene	ND	0.69		mg/Kg	1	4/29/2006
Hexachlorobutadiene	ND	0.49		mg/Kg	1	4/29/2006
Tetrachloroethene (PCE)	ND	0.69		mg/Kg	1	4/29/2006
Trichloroethene (TCE)	ND	0.49		mg/Kg	1	4/29/2006
Vinyl chloride	ND	0.20		mg/Kg	1	4/29/2006
Surr: 1,2-Dichloroethane-d4	115	59.1-130		%REC	1	4/29/2006
Surr: 4-Bromofluorobenzene	129	92.1-112	S	%REC	1	4/29/2006
Surr: Dibromofluoromethane	125	76.6-130		%REC	1	4/29/2006
Surr: Toluene-d8	102	81.8-118		%REC	1	4/29/2006

Qualifiers:

- * Value exceeds Maximum Contaminant Level
- E Value above quantitation range
- J Analyte detected below quantitation limits
- S Spike Recovery outside accepted recovery limits
- B Analyte detected in the associated Method Blank
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit

ENERGY LABORATORIES, INC. * 2393 Salt Creek Highway (82601) * PO Box 3258 * Casper, WY 82602
Toll Free 888.235.0515 * 307.235.0515 * FAX 307.234.1639 * casper@energylab.com * www.energylab.com

LABORATORY ANALYTICAL REPORT

Client: Hall Environmental
Project: 0604249
Lab ID: C06041211-001
Client Sample ID: Waste Oil East

Report Date: 05/12/06
Collection Date: 04/25/06 12:00
Date Received: 04/28/06
Matrix: Oil

Analyses	Result	Units	Qual	RL	MCL/ QCL	Method	Analysis Date / By
METALS - TOTAL							
Arsenic	ND	mg/kg		10		SW6010B	05/10/06 23:03 / cp
Barium	ND	mg/kg		100		SW6010B	05/10/06 23:03 / cp
Cadmium	ND	mg/kg		2.0		SW6010B	05/10/06 23:03 / cp
Chromium	ND	mg/kg		10		SW6010B	05/10/06 23:03 / cp
Lead	ND	mg/kg		10		SW6010B	05/10/06 23:03 / cp
Mercury	ND	mg/kg		0.05		SW7471A	05/01/06 16:57 / sjl
Selenium	ND	mg/kg		2.0		SW6010B	05/10/06 23:03 / cp
Silver	ND	mg/kg		10		SW6010B	05/10/06 23:03 / cp
METALS - POTENTIAL TCLP							
Arsenic, TCLP equivalent (calc)	ND	mg/L		0.50	5	SW6010B	05/10/06 23:03 / cp
Barium, TCLP equivalent (calc)	ND	mg/L		5.0	100	SW6010B	05/10/06 23:03 / cp
Cadmium, TCLP equivalent (calc)	ND	mg/L		0.10	1	SW6010B	05/10/06 23:03 / cp
Chromium, TCLP equivalent (calc)	ND	mg/L		0.50	5	SW6010B	05/10/06 23:03 / cp
Lead, TCLP equivalent (calc)	ND	mg/L		0.50	5	SW6010B	05/10/06 23:03 / cp
Mercury, TCLP equivalent (calc)	ND	mg/L		0.002	0.2	SW7471A	05/01/06 16:57 / sjl
Selenium, TCLP equivalent (calc)	ND	mg/L		0.10	1	SW6010B	05/10/06 23:03 / cp
Silver, TCLP equivalent (calc)	ND	mg/L		0.50	5	SW6010B	05/10/06 23:03 / cp

Report Definitions:
RL - Analyte reporting limit.
QCL - Quality control limit.
MCL - Maximum contaminant level.
ND - Not detected at the reporting limit.

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LABORATORY ANALYTICAL REPORT

Client: Hall Environmental
Project: 0604249
Lab ID: C06041211-002
Client Sample ID: Waste Oil West

Report Date: 05/12/06
Collection Date: 04/25/06 12:30
Date Received: 04/28/06
Matrix: Oil

Analyses	Result	Units	Qual	RL	MCL/ QCL	Method	Analysis Date / By
METALS - TOTAL							
Arsenic	ND	mg/kg		10		SW6010B	05/10/06 22:43 / cp
Barium	ND	mg/kg		100		SW6010B	05/10/06 22:43 / cp
Cadmium	ND	mg/kg		2.0		SW6010B	05/10/06 22:43 / cp
Chromium	ND	mg/kg		10		SW6010B	05/10/06 22:43 / cp
Lead	ND	mg/kg		10		SW6010B	05/10/06 22:43 / cp
Mercury	ND	mg/kg		0.05		SW7471A	05/01/06 16:59 / sjl
Selenium	ND	mg/kg		2.0		SW6010B	05/10/06 22:43 / cp
Silver	ND	mg/kg		10		SW6010B	05/10/06 22:43 / cp
METALS - POTENTIAL TCLP							
Arsenic, TCLP equivalent (calc)	ND	mg/L		0.50	5	SW6010B	05/10/06 22:43 / cp
Barium, TCLP equivalent (calc)	ND	mg/L		5.0	100	SW6010B	05/10/06 22:43 / cp
Cadmium, TCLP equivalent (calc)	ND	mg/L		0.10	1	SW6010B	05/10/06 22:43 / cp
Chromium, TCLP equivalent (calc)	ND	mg/L		0.50	5	SW6010B	05/10/06 22:43 / cp
Lead, TCLP equivalent (calc)	ND	mg/L		0.50	5	SW6010B	05/10/06 22:43 / cp
Mercury, TCLP equivalent (calc)	ND	mg/L		0.002	0.2	SW7471A	05/01/06 16:59 / sjl
Selenium, TCLP equivalent (calc)	ND	mg/L		0.10	1	SW6010B	05/10/06 22:43 / cp
Silver, TCLP equivalent (calc)	ND	mg/L		0.50	5	SW6010B	05/10/06 22:43 / cp

Report Definitions: RL - Analyte reporting limit. QCL - Quality control limit. MCL - Maximum contaminant level. ND - Not detected at the reporting limit.

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LABORATORY ANALYTICAL REPORT

Client: Hall Environmental
Project: 0604249
Lab ID: C06041211-003
Client Sample ID: PC 500

Report Date: 05/12/06
Collection Date: 04/25/06 13:00
Date Received: 04/28/06
Matrix: Oil

Analyses	Result	Units	Qual	RL	MCL/ QCL	Method	Analysis Date / By
METALS - TOTAL							
Arsenic	ND	mg/kg		10		SW6010B	05/10/06 23:00 / cp
Barium	ND	mg/kg		100		SW6010B	05/10/06 23:00 / cp
Cadmium	ND	mg/kg		2.0		SW6010B	05/10/06 23:00 / cp
Chromium	ND	mg/kg		10		SW6010B	05/10/06 23:00 / cp
Lead	ND	mg/kg		10		SW6010B	05/10/06 23:00 / cp
Mercury	0.84	mg/kg		0.05		SW7471A	05/01/06 17:01 / sjl
Selenium	ND	mg/kg		2.0		SW6010B	05/10/06 23:00 / cp
Silver	ND	mg/kg		10		SW6010B	05/10/06 23:00 / cp
METALS - POTENTIAL TCLP							
Arsenic, TCLP equivalent (calc)	ND	mg/L		0.50	5	SW6010B	05/10/06 23:00 / cp
Barium, TCLP equivalent (calc)	ND	mg/L		5.0	100	SW6010B	05/10/06 23:00 / cp
Cadmium, TCLP equivalent (calc)	ND	mg/L		0.10	1	SW6010B	05/10/06 23:00 / cp
Chromium, TCLP equivalent (calc)	ND	mg/L		0.50	5	SW6010B	05/10/06 23:00 / cp
Lead, TCLP equivalent (calc)	ND	mg/L		0.50	5	SW6010B	05/10/06 23:00 / cp
Mercury, TCLP equivalent (calc)	0.042	mg/L		0.002	0.2	SW7471A	05/01/06 17:01 / sjl
Selenium, TCLP equivalent (calc)	ND	mg/L		0.10	1	SW6010B	05/10/06 23:00 / cp
Silver, TCLP equivalent (calc)	ND	mg/L		0.50	5	SW6010B	05/10/06 23:00 / cp

Report Definitions:
RL - Analyte reporting limit.
QCL - Quality control limit.
MCL - Maximum contaminant level.
ND - Not detected at the reporting limit.

QA/QC Summary Report

Client: Hall Environmental
Project: 0604249

Report Date: 05/12/06
Work Order: C06041211

Analyte	Result	Units	RL	%REC	Low Limit	High Limit	RPD	RPDLimit	Qual
Method: SW6010B									Batch: 10918
Sample ID: MB-10918	Method Blank				Run: ICP2-C_060510A				05/10/06 19:52
Arsenic	0.03	mg/kg	0.02						
Barium	ND	mg/kg	0.002						
Cadmium	ND	mg/kg	0.003						
Chromium	ND	mg/kg	0.003						
Lead	ND	mg/kg	0.007						
Selenium	ND	mg/kg	0.02						
Silver	ND	mg/kg	0.005						
Method: SW7471A									Batch: 10844
Sample ID: C06041114-003AMS	Sample Matrix Spike				Run: CVAA-C201_060501B				05/01/06 17:06
Mercury	19	mg/kg	0.13	116	85	115			
Sample ID: C06041114-003AMSD	Sample Matrix Spike Duplicate				Run: CVAA-C201_060501B				05/01/06 17:10
Mercury	19	mg/kg	0.13	115	85	115	1.6	30	
Sample ID: C265-142-3	Laboratory Control Sample				Run: CVAA-C201_060501B				05/01/06 17:14
Mercury	0.47	mg/kg	0.050	94	90	110			
Sample ID: MBLK	Method Blank				Run: CVAA-C201_060501B				05/01/06 17:19
Mercury	ND	mg/kg	0.01						

Qualifiers:

RL - Analyte reporting limit.

ND - Not detected at the reporting limit.

QA/QC SUMMARY REPORT

Client: Transwestern Pipeline NDL Station
Project: Roswell C/S #9 **Work Order:** 0604249

Analyte	Result	Units	PQL	%Rec	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Method: SW8270C									
Sample ID: MB-10384		*MBLK*							
1,4-Dinitrotoluene	ND	mg/Kg	100						
Hexachlorobenzene	ND	mg/Kg	0.13						
Hexachlorobutadiene	ND	mg/Kg	0.50						
Hexachloroethane	ND	mg/Kg	3.0						
2-Methylphenol	ND	mg/Kg	200						
3+4-Methylphenol	ND	mg/Kg	200						
Nitrobenzene	ND	mg/Kg	2.0						
Pentachlorophenol	ND	mg/Kg	100						
Pyridine	ND	mg/Kg	5.0						
2,4,5-Trichlorophenol	ND	mg/Kg	400						
2,4,6-Trichlorophenol	ND	mg/Kg	2.0						
Sample ID: LCS-10384		*LCS*							
1,4-Dichlorobenzene	2178	mg/Kg	100	87.1	70	130			
2,4-Dinitrotoluene	2012	mg/Kg	0.010	80.5	70	130			
Hexachlorobenzene	1806	mg/Kg	0.010	72.2	70	130			
Hexachlorobutadiene	2750	mg/Kg	0.010	110	70	130			
Hexachloroethane	2235	mg/Kg	0.010	89.4	70	130			
2-Methylphenol	2262	mg/Kg	0.010	90.5	70	130			
3+4-Methylphenol	3946	mg/Kg	0.010	78.9	70	130			
Nitrobenzene	2186	mg/Kg	0.010	87.4	70	130			
Pentachlorophenol	1789	mg/Kg	0.010	71.6	70	130			
Pyridine	2171	mg/Kg	0.010	86.8	70	130			
2,4,5-Trichlorophenol	2098	mg/Kg	0.010	83.9	70	130			
2,4,6-Trichlorophenol	2078	mg/Kg	0.010	83.1	70	130			

Batch ID: 10384
Analysis Date: 5/9/2006

Analysis Date: 5/9/2006

Qualifiers:

- E Value above quantitation range
- J Analyte detected below quantitation limits
- R RPD outside accepted recovery limits
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- S Spike recovery outside accepted recovery limits

QA/QC SUMMARY REPORT

Client: Transwestern Pipeline NDL Station
Project: Roswell C/S #9 **Work Order:** 0604249

Analyte	Result	Units	PQL	%Rec	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Method: SW8260B									**Batch ID:** 10269
Sample ID: mb-10269		*MBLK*							Analysis Date: 4/29/2006
Benzene	ND	mg/Kg	2.5						
1,2-Dichloroethane (EDC)	ND	mg/Kg	2.5						
2-Butanone	ND	mg/Kg	25						
Carbon Tetrachloride	ND	mg/Kg	2.5						
Chlorobenzene	ND	mg/Kg	5.0						
Chloroform	ND	mg/Kg	2.5						
1,4-Dichlorobenzene	ND	mg/Kg	2.5						
1,1-Dichloroethene	ND	mg/Kg	2.5						
Hexachlorobutadiene	ND	mg/Kg	2.5						
Tetrachloroethene (PCE)	ND	mg/Kg	2.5						
Trichloroethene (TCE)	ND	mg/Kg	2.5						
Vinyl chloride	ND	mg/Kg	2.5						

Qualifiers:

- E Value above quantitation range
- J Analyte detected below quantitation limits
- R RPD outside accepted recovery limits
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- S Spike Recovery outside accepted recovery limits

Hall Environmental Analysis Laboratory

Sample Receipt Checklist

Client Name TWP | Date and Time Received: 4/26/2006

Work Order Number 0604249 | Received by AT

Checklist completed by _____ 4/26/06
Signature | Date

Matrix | Carrier name UPS

Shipping container/cooler in good condition?	Yes ☑	No ☐	Not Present ☐	
Custody seals intact on shipping container/cooler?	Yes ☑	No ☐	Not Present ☐	Not Shipped ☐
Custody seals intact on sample bottles?	Yes ☑	No ☐	N/A ☐	
Chain of custody present?	Yes ☑	No ☐		
Chain of custody signed when relinquished and received?	Yes ☑	No ☐		
Chain of custody agrees with sample labels?	Yes ☑	No ☐		
Samples in proper container/bottle?	Yes ☐	No ☑		
Sample containers intact?	Yes ☑	No ☐		
Sufficient sample volume for indicated test?	Yes ☑	No ☐		
All samples received within holding time?	Yes ☑	No ☐		
Water - VOA vials have zero headspace?	No VOA vials submitted ☑	Yes ☐	No ☐	
Water - pH acceptable upon receipt?	Yes ☐	No ☐	N/A ☑	
Container/Temp Blank temperature?	2°	*4° C ± 2 Acceptable* If given sufficient time to cool.		

COMMENTS:

Client contacted _____ Date contacted: _____ Person contacted _____

Contacted by: _____ Regarding _____

Comments: _____

_____

_____

_____

_____

Corrective Action _____

_____

_____

CHAIN-OF-CUSTODY RECORD

QA / QC Package:
Std ☒ Level 4 ☐
Other:

HALL ENVIRONMENTAL ANALYSIS LABORATORY
4901 Hawkins NE, Suite D
Albuquerque, New Mexico 87109
Tel. 505.345.3975 Fax 505.345.4107
www.hallenvironmental.com

Client: Transwestern Pipeline Co- Roswell Team
Address: 6381 N Main Street Roswell, N.M 88201
Phone #: 505-626-3644
Fax #: 505-625-8089

Project Name: Roswell C/S #9
Project #: C/S #9 Waste oil
Project Manager: Dustin Jolly
Sampler: Dustin Jolly
Sample Temperature: 2°

Date	Time	Matrix	Sample I.D. No.	Number/Volume	Preservative $HgCl_2$	Preservative HNO_3	HEAL No.
04-25	1200	oil	Waste oil East	1			Hall249-1
04-25	1230	oil	Waste oil West	1			-2
04-25	1300	oil	PC500	2			-3

ANALYSIS REQUEST

BTEX + MTBE + TMB's (8021)	BTEX + MTBE + TPH (Gasoline Only)	TPH Method 8015B (Gas/Diesel)	TPH (Method 418.1)	EDB (Method 504.1)	EDC (Method 8021)	8310 (PNA or PAH)	RCRA 8 Metals	Anions (F, Cl, NO_3, NO_2, PO_4, SO_4)	8081 Pesticides / PCB's (8082)	8260B (VOA)	8270 (Semi-VOA)	TCLP - Metals	TCLP - Volatiles	TCLP - Semi Volatiles	Air Bubbles or Headspace (Y or N)
												X	X	X	
												X	X	X	
												X	X	X	

Date	Time	Relinquished By: (Signature)	Received By: (Signature)
04-25-06	1330		Lisa Hall 0910 4/26/06
Date:	Time:	Relinquished By: (Signature)	Received By: (Signature)

Remarks: Send Results To Transwestern Pipeline Co 6381 N Main Street Roswell, N.M 88201 Attn: Dustin Jolly
~~FAX~~ / email Results

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TX 77054
(713) 660-0901

Transwestern Pipeline Company

Certificate of Analysis Number:

07101544

Report To:		Project Name:	TranswesternPL
Transwestern Pipeline Company		Site:	6381 N. Main, Roswell, NM
Larry Campbell		Site Address:	
6381 North Main Street			
Roswell		PO Number:	
NM		State:	New Mexico
88201-		State Cert. No.:	
ph: (505) 625-8022	fax:	Date Reported:	11/16/2007

This Report Contains A Total Of 14 Pages

Excluding This Page, Chain Of Custody

And

Any Attachments

PIPELINE LIQUIDS

11/16/2007

Date

Test results meet all requirements of NELAC, unless specified in the narrative.

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TX 77054
(713) 660-0901

Case Narrative for:

Transwestern Pipeline Company

Certificate of Analysis Number:

07101544

Report To:		Project Name:	TranswesternPL
Transwestern Pipeline Company		Site:	6381 N. Main, Roswell, NM
Larry Campbell		Site Address:	
6381 North Main Street			
Roswell		PO Number:	
NM		State:	New Mexico
88201-		State Cert. No.:	
ph: (505) 625-8022	fax:	Date Reported:	11/16/2007

A trip blank was received but was not analyzed because it was not applicable to the sample matrix.

Results are reported on a wet weight basis unless dry-weight correction is denoted in the units field on the analytical report (" mg\kg-dry " or " ug\kg-dry ").

For the PCB analysis, the ending continuing calibration verification standard for the MS/MSD was higher than the QC limits.

Matrix spike (MS) and matrix spike duplicate (MSD) samples are chosen and tested at random from an analytical batch of "like" matrix to check for possible matrix effect. The MS and MSD will provide site specific matrix data only for those samples which are spiked by the laboratory. Since the MS and MSD are chosen at random from an analytical batch, the sample chosen for spike purposes may or may not have been a sample submitted in this sample delivery group. The validity of the analytical procedures for which data is reported in this analytical report is determined by the Laboratory Control Sample (LCS) and the Method Blank (MB). The Laboratory Control Sample (LCS) and the Method Blank (MB) are processed with the samples and the MS/MSD to ensure method criteria are achieved throughout the entire analytical process.

Your sample ID "CS91" (SPL ID:07101544-01) was randomly selected for use in SPL's quality control program for the Polychlorinated Biphenyls analysis by SW846 Method 8082. The Matrix Spike Duplicate (MSD) recovery was outside of the advisable quality control limits for Aroclor 1016 (Batch ID:72813) due to matrix interference. A Laboratory Control Sample (LCS) was analyzed as a quality control check for the analytical batch and all recoveries were within acceptable limits.

Some of the percent recoveries and RPD's on the QC report for the MS/MSD may be different than the calculated recoveries and RPD's using the sample result and the MS/MSD results that appear on the report because, the actual raw result is used to perform the calculations for percent recovery and RPD.

Any other exceptions associated with this report will be footnoted in the analytical result page(s) or the quality control summary page(s).

Please do not hesitate to contact us if you have any questions or comments pertaining to this data report. Please reference the above Certificate of Analysis Number.

SPL, Inc. is pleased to be of service to you. We anticipate working with you in fulfilling all your current and future analytical needs.

Elessa Sommers
Senior Project Manager

11/16/2007
Date

Test results meet all requirements of NELAC, unless specified in the narrative.

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TX 77054
(713) 660-0901

Transwestern Pipeline Company

Certificate of Analysis Number:

07101544

Report To: Transwestern Pipeline Company
Larry Campbell
6381 North Main Street

Roswell
NM
88201-
ph: (505) 625-8022 fax: (505) 627-8172

Fax To:

Project Name: TranswesternPL
Site: 6381 N. Main, Roswell, NM
Site Address:

PO Number:
State: New Mexico
State Cert. No.:
Date Reported: 11/16/2007

Client Sample ID	Lab Sample ID	Matrix	Date Collected	Date Received	COC ID	HOLD
CS91	07101544-01	Oil	10/30/2007 11:00:00 AM	10/31/2007 10:00:00 AM		☐

Elessa Sommers
Senior Project Manager

11/16/2007
Date

Richard R. Reed
Laboratory Director

Ted Yen
Quality Assurance Officer

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TX 77054
(713) 660-0901

Client Sample ID: CS91 **Collected:** 10/30/2007 11:00 **SPL Sample ID:** 07101544-01

Site: 6381 N. Main, Roswell, NM

Analyses/Method	Result	QUAL	Rep.Limit	Dil. Factor	Date Analyzed	Analyst	Seq. #
IGNITABILITY				**MCL**	**SW1010A**	**Units: °F**	
Ignitability	>212		20	1	11/01/07 9:00	T_L	4110274
MERCURY, TCLP				**MCL**	**SW7471A**	**Units: mg/kg**	
Mercury	0.135		0.03	1	11/01/07 14:34	EMB	4110991

Prep Method	Prep Date	Prep Initials	Prep Factor	Leach Method	Leachate Date	Leach Initials
SW7471A	11/01/2007 8:45	EMB	1.00	SW1311	10/31/2007	T_L

METALS BY METHOD 6010B, TCLP				MCL	SW6010B	Units: mg/kg	
Arsenic	21.6		10	1	11/07/07 23:44	EG	4123330
Barium	23.9		0.5	1	11/07/07 23:44	EG	4123330
Cadmium	1.46		0.5	1	11/07/07 23:44	EG	4123330
Chromium	2.38		1	1	11/07/07 23:44	EG	4123330
Lead	25.4		5	1	11/07/07 23:44	EG	4123330
Selenium	ND		10	1	11/07/07 23:44	EG	4123330
Silver	ND		1	1	11/07/07 23:44	EG	4123330

Prep Method	Prep Date	Prep Initials	Prep Factor	Leach Method	Leachate Date	Leach Initials
SW3050B	11/07/2007 13:15	F_I	1.00	SW1311	10/31/2007	T_L

POLYCHLORINATED BIPHENYLS BY METHOD 8082					MCL	SW8082	Units: mg/Kg	
Aroclor 1016	ND			2	2	10/31/07 13:43	CLJ	4109513
Aroclor 1221	ND			2	2	10/31/07 13:43	CLJ	4109513
Aroclor 1232	ND			2	2	10/31/07 13:43	CLJ	4109513
Aroclor 1242	28			2	2	10/31/07 13:43	CLJ	4109513
Aroclor 1248	ND			2	2	10/31/07 13:43	CLJ	4109513
Aroclor 1254	ND			2	2	10/31/07 13:43	CLJ	4109513
Aroclor 1260	ND			2	2	10/31/07 13:43	CLJ	4109513
Surr: Tetrachloro-m-xylene	93.5		%	55-177	2	10/31/07 13:43	CLJ	4109513
Surr: Decachlorobiphenyl	88.9		%	63-161	2	10/31/07 13:43	CLJ	4109513

Prep Method	Prep Date	Prep Initials	Prep Factor
SW3580A	10/31/2007 12:00	WLV	1.00

PURGEABLE AROMATICS					MCL	SW8021B	Units: ug/kg	
Benzene	570000			10000	1000	10/31/07 13:48	SFE	4109971
Surr: 1,4-Difluorobenzene	135 mi	*	%	77-126	1000	10/31/07 13:48	SFE	4109971
Surr: 4-Bromofluorobenzene	124		%	60-160	1000	10/31/07 13:48	SFE	4109971

Prep Method	Prep Date	Prep Initials	Prep Factor
SW3580A	10/31/2007 13:24	NMa	10.00

Qualifiers:

ND/U - Not Detected at the Reporting Limit
B/V - Analyte detected in the associated Method Blank
* - Surrogate Recovery Outside Advisable QC Limits
J - Estimated Value between MDL and PQL
E - Estimated Value exceeds calibration curve
TNTC - Too numerous to count
>MCL - Result Over Maximum Contamination Limit(MCL)
D - Surrogate Recovery Unreportable due to Dilution
MI - Matrix Interference

Quality Control Documentation

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TX 77054
(713) 660-0901

Quality Control Report

Transwestern Pipeline Company

TranswesternPL

Analysis: Polychlorinated Biphenyls by Method 8082 **WorkOrder:** 07101544
Method: SW8082 **Lab Batch ID:** 72813

Method Blank

RunID: HP_W_071031A-4109500 Units: mg/Kg
Analysis Date: 10/31/2007 13:06 Analyst: CLJ
Preparation Date: 10/31/2007 12:00 Prep By: WLV Method SW3580A

Samples in Analytical Batch:

Lab Sample ID	Client Sample ID
07101544-01A	CS91

Analyte	Result	Rep Limit
Aroclor 1016	ND	1.0
Aroclor 1221	ND	1.0
Aroclor 1232	ND	1.0
Aroclor 1242	ND	1.0
Aroclor 1248	ND	1.0
Aroclor 1254	ND	1.0
Aroclor 1260	ND	1.0
Surr: Decachlorobiphenyl	91.4	63-161
Surr: Tetrachloro-m-xylene	109.6	55-177

Laboratory Control Sample (LCS)

RunID: HP_W_071031A-4109507 Units: mg/Kg
Analysis Date: 10/31/2007 13:25 Analyst: CLJ
Preparation Date: 10/31/2007 12:00 Prep By: WLV Method SW3580A

Analyte	Spike Added	Result	Percent Recovery	Lower Limit	Upper Limit
Aroclor 1016	10.0	10.4	104	59	173
Aroclor 1260	10.0	9.47	94.7	58	180
Surr: Decachlorobiphenyl	1.00	0.94	94.0	63	161
Surr: Tetrachloro-m-xylene	1.00	0.985	98.5	55	177

Matrix Spike (MS) / Matrix Spike Duplicate (MSD)

Sample Spiked: 07101544-01
RunID: HP_W_071031A-4110638 Units: mg/Kg
Analysis Date: 11/01/2007 9:40 Analyst: CLJ
Preparation Date: 10/31/2007 12:00 Prep By: WLV Method SW3580A

Analyte	Sample Result	MS Spike Added	MS Result	MS % Recovery	MSD Spike Added	MSD Result	MSD % Recovery	RPD	RPD Limit	Low Limit	High Limit
Aroclor 1016	ND	10	16.2	162	10	18.3	183 *	12.4	30	66	182
Aroclor 1260	ND	10	8.21	82.1	10	8.77	87.7	6.55	30	25	199

Qualifiers:

ND/U - Not Detected at the Reporting Limit
B/V - Analyte detected in the associated Method Blank
J - Estimated value between MDL and PQL
E - Estimated Value exceeds calibration curve
MI - Matrix Interference
D - Recovery Unreportable due to Dilution
* - Recovery Outside Advisable QC Limits
N/C - Not Calculated - Sample concentration is greater than 4 times the amount of spike added. Control limits do not apply.
TNTC - Too numerous to count

QC results presented on the QC Summary Report have been rounded. RPD and percent recovery values calculated by the SPL LIMS system are derived from QC data prior to the application of rounding rules.

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TX 77054
(713) 660-0901

Quality Control Report

Transwestern Pipeline Company

TranswesternPL

Analysis: Polychlorinated Biphenyls by Method 8082 **WorkOrder:** 07101544
Method: SW8082 **Lab Batch ID:** 72813

Matrix Spike (MS) / Matrix Spike Duplicate (MSD)

Sample Spiked: 07101544-01
RunID: HP_W_071031A-4110638 Units: mg/Kg
Analysis Date: 11/01/2007 9:40 Analyst: CLJ
Preparation Date: 10/31/2007 12:00 Prep By: WLV Method SW3580A

Analyte	Sample Result	MS Spike Added	MS Result	MS % Recovery	MSD Spike Added	MSD Result	MSD % Recovery	RPD	RPD Limit	Low Limit	High Limit
Surr: Decachlorobiphenyl	ND	1	0.452	45.2 *	1	51.91 MI	51.9 *	13.8	30	63	161
Surr: Tetrachloro-m-xylene	ND	1	0.654	65.4	1	0.718	71.8	9.32	30	55	177

Qualifiers:

ND/U - Not Detected at the Reporting Limit
B/V - Analyte detected in the associated Method Blank
J - Estimated value between MDL and PQL
E - Estimated Value exceeds calibration curve
MI - Matrix Interference
D - Recovery Unreportable due to Dilution
* - Recovery Outside Advisable QC Limits
N/C - Not Calculated - Sample concentration is greater than 4 times the amount of spike added. Control limits do not apply.
TNTC - Too numerous to count

QC results presented on the QC Summary Report have been rounded. RPD and percent recovery values calculated by the SPL LIMS system are derived from QC data prior to the application of rounding rules.

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TX 77054
(713) 660-0901

Quality Control Report

Transwestern Pipeline Company

TranswesternPL

Analysis: Purgeable Aromatics
Method: SW8021B

WorkOrder: 07101544
Lab Batch ID: R217776

Method Blank

RunID: HP_S_071030F-4109964 Units: ug/kg
Analysis Date: 10/31/2007 0:08 Analyst: SFE
Preparation Date: 10/31/2007 0:08 Prep By: Method

Samples in Analytical Batch:

Lab Sample ID	Client Sample ID
07101544-01A	CS91

Analyte	Result	Rep Limit
Benzene	ND	1.0
Surr: 1,4-Difluorobenzene	102.3	77-126
Surr: 4-Bromofluorobenzene	94.5	60-160

Methanolic Preparation Blank

RunID: HP_S_071030F-4109965 Units: ug/kg
Analysis Date: 10/31/2007 0:37 Analyst: SFE
Preparation Date: 10/31/2007 0:37 Prep By: Method SW5030B

Analyte	Result	Rep Limit
Benzene	ND	25
Surr: 1,4-Difluorobenzene	103.3	77-126
Surr: 4-Bromofluorobenzene	95.1	60-160

Laboratory Control Sample (LCS)

RunID: HP_S_071030F-4109963 Units: ug/kg
Analysis Date: 10/30/2007 23:11 Analyst: SFE
Preparation Date: 10/30/2007 23:11 Prep By: Method SW5030B

Analyte	Spike Added	Result	Percent Recovery	Lower Limit	Upper Limit
Benzene	20.0	21.7	109	70	130
Surr: 1,4-Difluorobenzene	30.0	30.7	102	77	126
Surr: 4-Bromofluorobenzene	30.0	28.8	96.1	60	160

Matrix Spike (MS) / Matrix Spike Duplicate (MSD)

Sample Spiked: 07101499-01
RunID: HP_S_071030F-4109969 Units: ug/kg
Analysis Date: 10/31/2007 7:48 Analyst: SFE
Preparation Date: 10/30/2007 18:07 Prep By: SFE Method SW5030B

Qualifiers:

ND/U - Not Detected at the Reporting Limit
B/V - Analyte detected in the associated Method Blank
J - Estimated value between MDL and PQL
E - Estimated Value exceeds calibration curve
MI - Matrix Interference
D - Recovery Unreportable due to Dilution
* - Recovery Outside Advisable QC Limits
N/C - Not Calculated - Sample concentration is greater than 4 times the amount of spike added. Control limits do not apply.
TNTC - Too numerous to count

QC results presented on the QC Summary Report have been rounded. RPD and percent recovery values calculated by the SPL LIMS system are derived from QC data prior to the application of rounding rules.

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TX 77054
(713) 660-0901

Quality Control Report

Transwestern Pipeline Company

TranswesternPL

Analysis: Purgeable Aromatics
Method: SW8021B

WorkOrder: 07101544
Lab Batch ID: R217776

Analyte	Sample Result	MS Spike Added	MS Result	MS % Recovery	MSD Spike Added	MSD Result	MSD % Recovery	RPD	RPD Limit	Low Limit	High Limit
Benzene	ND	20	15.0	74.9	20	14.7	73.4	2.00	32	36	139
Surr: 1,4-Difluorobenzene	ND	30	28.9	96.3	30	29.7	98.9	2.61	30	77	126
Surr: 4-Bromofluorobenzene	ND	30	27.5	91.8	30	27.5	91.7	0.117	30	60	160

Qualifiers:

ND/U - Not Detected at the Reporting Limit
B/V - Analyte detected in the associated Method Blank
J - Estimated value between MDL and PQL
E - Estimated Value exceeds calibration curve
MI - Matrix Interference
D - Recovery Unreportable due to Dilution
* - Recovery Outside Advisable QC Limits
N/C - Not Calculated - Sample concentration is greater than 4 times the amount of spike added. Control limits do not apply.
TNTC - Too numerous to count

QC results presented on the QC Summary Report have been rounded. RPD and percent recovery values calculated by the SPL LIMS system are derived from QC data prior to the application of rounding rules.

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TX 77054
(713) 660-0901

Quality Control Report

Transwestern Pipeline Company

TranswesternPL

Analysis: Mercury, TCLP
Method: SW7471A

WorkOrder: 07101544
Lab Batch ID: 72865

Method Blank

RunID: HGLC_071101A-4110989 Units: mg/kg
Analysis Date: 11/01/2007 14:29 Analyst: EMB
Preparation Date: 11/01/2007 8:45 Prep By: EMB Method SW7471A

Samples in Analytical Batch:

Lab Sample ID	Client Sample ID
07101544-01A	CS91

Analyte	Result	Rep Limit
Mercury	ND	0.03

Laboratory Control Sample (LCS)

RunID: HGLC_071101A-4110990 Units: mg/kg
Analysis Date: 11/01/2007 14:32 Analyst: EMB
Preparation Date: 11/01/2007 8:45 Prep By: EMB Method SW7471A

Analyte	Spike Added	Result	Percent Recovery	Lower Limit	Upper Limit
Mercury	100.0	104.4	104.4	50	150

Matrix Spike (MS) / Matrix Spike Duplicate (MSD)

Sample Spiked: 07101544-01
RunID: HGLC_071101A-4110992 Units: mg/kg
Analysis Date: 11/01/2007 14:36 Analyst: EMB
Preparation Date: 11/01/2007 8:45 Prep By: EMB Method SW7471A

Analyte	Sample Result	MS Spike Added	MS Result	MS % Recovery	MSD Spike Added	MSD Result	MSD % Recovery	RPD	RPD Limit	Low Limit	High Limit
Mercury	0.1355	0.3	0.4160	93.50	0.3	0.4132	92.58	0.6608	20	10	200

Qualifiers:

ND/U - Not Detected at the Reporting Limit
B/V - Analyte detected in the associated Method Blank
J - Estimated value between MDL and PQL
E - Estimated Value exceeds calibration curve
MI - Matrix Interference
D - Recovery Unreportable due to Dilution
* - Recovery Outside Advisable QC Limits
N/C - Not Calculated - Sample concentration is greater than 4 times the amount of spike added. Control limits do not apply.
TNTC - Too numerous to count

QC results presented on the QC Summary Report have been rounded. RPD and percent recovery values calculated by the SPL LIMS system are derived from QC data prior to the application of rounding rules.

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TX 77054
(713) 660-0901

Quality Control Report

Transwestern Pipeline Company

TranswesternPL

Analysis: Metals by Method 6010B, TCLP
Method: SW6010B
WorkOrder: 07101544
Lab Batch ID: 73069

Method Blank

RunID: TJA_071107A-4123328 Units: mg/kg
Analysis Date: 11/07/2007 23:35 Analyst: EG
Preparation Date: 11/07/2007 13:15 Prep By: F_I Method SW3050B

Samples in Analytical Batch:

Lab Sample ID	Client Sample ID
07101544-01A	CS91

Analyte	Result	Rep Limit
Arsenic	ND	10
Barium	ND	0.5
Cadmium	ND	0.5
Chromium	ND	1
Lead	ND	5
Selenium	ND	10
Silver	ND	1

Laboratory Control Sample (LCS)

RunID: TJA_071107A-4123329 Units: mg/kg
Analysis Date: 11/07/2007 23:39 Analyst: EG
Preparation Date: 11/07/2007 13:15 Prep By: F_I Method SW3050B

Analyte	Spike Added	Result	Percent Recovery	Lower Limit	Upper Limit
Arsenic	100.0	79.96	79.96	50	150
Barium	100.0	97.53	97.53	50	150
Cadmium	100.0	97.76	97.76	50	150
Chromium	100.0	94.41	94.41	50	150
Lead	100.0	101.8	101.8	50	150
Selenium	100.0	108.7	108.7	50	150
Silver	100.0	106.2	106.2	50	150

Matrix Spike (MS) / Matrix Spike Duplicate (MSD)

Sample Spiked: 07101544-01
RunID: TJA_071107A-4123331 Units: mg/kg
Analysis Date: 11/07/2007 23:48 Analyst: EG
Preparation Date: 11/07/2007 13:15 Prep By: F_I Method SW3050B

Analyte	Sample Result	MS Spike Added	MS Result	MS % Recovery	MSD Spike Added	MSD Result	MSD % Recovery	RPD	RPD Limit	Low Limit	High Limit
Arsenic	21.63	100	119.4	97.75	100	119.9	98.25	0.4171	30	50	150

Qualifiers:

ND/U - Not Detected at the Reporting Limit
B/V - Analyte detected in the associated Method Blank
J - Estimated value between MDL and PQL
E - Estimated Value exceeds calibration curve
MI - Matrix Interference
D - Recovery Unreportable due to Dilution
* - Recovery Outside Advisable QC Limits
N/C - Not Calculated - Sample concentration is greater than 4 times the amount of spike added. Control limits do not apply.
TNTC - Too numerous to count

QC results presented on the QC Summary Report have been rounded. RPD and percent recovery values calculated by the SPL LIMS system are derived from QC data prior to the application of rounding rules.

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TX 77054
(713) 660-0901

Quality Control Report

Transwestern Pipeline Company

TranswesternPL

Analysis: Metals by Method 6010B, TCLP **WorkOrder:** 07101544
Method: SW6010B **Lab Batch ID:** 73069

Matrix Spike (MS) / Matrix Spike Duplicate (MSD)

Sample Spiked: 07101544-01
RunID: TJA_071107A-4123331 Units: mg/kg
Analysis Date: 11/07/2007 23:48 Analyst: EG
Preparation Date: 11/07/2007 13:15 Prep By: F_I Method SW3050B

Analyte	Sample Result	MS Spike Added	MS Result	MS % Recovery	MSD Spike Added	MSD Result	MSD % Recovery	RPD	RPD Limit	Low Limit	High Limit
Barium	23.87	100	122.2	98.31	100	126.1	102.3	3.179	30	50	150
Cadmium	1.456	100	100.2	98.77	100	101.0	99.53	0.7554	30	50	150
Chromium	2.378	100	105.2	102.8	100	106.9	104.5	1.635	30	50	150
Lead	25.38	100	120.1	94.71	100	121.7	96.30	1.308	30	50	150
Selenium	ND	100	99.49	99.49	100	102.3	102.3	2.793	30	50	150
Silver	ND	100	104.4	104.1	100	105.6	105.2	1.129	30	50	150

Qualifiers:
ND/U - Not Detected at the Reporting Limit
B/V - Analyte detected in the associated Method Blank
J - Estimated value between MDL and PQL
E - Estimated Value exceeds calibration curve
MI - Matrix Interference
D - Recovery Unreportable due to Dilution
* - Recovery Outside Advisable QC Limits
N/C - Not Calculated - Sample concentration is greater than 4 times the amount of spike added. Control limits do not apply.
TNTC - Too numerous to count

QC results presented on the QC Summary Report have been rounded. RPD and percent recovery values calculated by the SPL LIMS system are derived from QC data prior to the application of rounding rules.

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TX 77054
(713) 660-0901

Quality Control Report

Transwestern Pipeline Company

TranswesternPL

Analysis: Ignitability
Method: SW1010A

WorkOrder: 07101544
Lab Batch ID: R217800

Samples in Analytical Batch:

Lab Sample ID	Client Sample ID
07101544-01A	CS91

Laboratory Control Sample (LCS)

RunID: WET_071101B-4110273 Units: °F
Analysis Date: 11/01/2007 9:00 Analyst: T_L

Analyte	Spike Added	Result	Percent Recovery	Lower Limit	Upper Limit
Ignitability	81.00	81.00	100.0	97.5	102.5

Sample Duplicate

Original Sample: 07101544-01
RunID: WET_071101B-4110274 Units: °F
Analysis Date: 11/01/2007 9:00 Analyst: T_L

Analyte	Sample Result	DUP Result	RPD	RPD Limit
Ignitability	212	212	0	20

Qualifiers:

ND/U - Not Detected at the Reporting Limit
B/V - Analyte detected in the associated Method Blank
J - Estimated value between MDL and PQL
E - Estimated Value exceeds calibration curve
MI - Matrix Interference
D - Recovery Unreportable due to Dilution
* - Recovery Outside Advisable QC Limits
N/C - Not Calculated - Sample concentration is greater than 4 times the amount of spike added. Control limits do not apply.
TNTC - Too numerous to count

QC results presented on the QC Summary Report have been rounded. RPD and percent recovery values calculated by the SPL LIMS system are derived from QC data prior to the application of rounding rules.

Sample Receipt Checklist

And

Chain of Custody

HOUSTON LABORATORY
8880 INTERCHANGE DRIVE
HOUSTON, TX 77054
(713) 660-0901

Sample Receipt Checklist

Workorder:	07101544	Received By:	AE
Date and Time Received:	10/31/2007 10:00:00 AM	Carrier name:	UPS
Temperature:	4.5°C	Chilled by:	Water Ice

1.	Shipping container/cooler in good condition?	Yes ☑	No ☐	Not Present ☐	
2.	Custody seals intact on shippping container/cooler?	Yes ☐	No ☐	Not Present ☑	
3.	Custody seals intact on sample bottles?	Yes ☑	No ☐	Not Present ☐	
4.	Chain of custody present?	Yes ☑	No ☐		
5.	Chain of custody signed when relinquished and received?	Yes ☑	No ☐		
6.	Chain of custody agrees with sample labels? Trip blank received, not listed on COC.	Yes ☐	No ☑		
7.	Samples in proper container/bottle?	Yes ☑	No ☐		
8.	Sample containers intact?	Yes ☑	No ☐		
9.	Sufficient sample volume for indicated test?	Yes ☑	No ☐		
10.	All samples received within holding time?	Yes ☑	No ☐		
11.	Container/Temp Blank temperature in compliance?	Yes ☑	No ☐		
12.	Water - VOA vials have zero headspace?	Yes ☐	No ☐	VOA Vials Not Present ☑	
13.	Water - Preservation checked upon receipt (except VOA*)?	Yes ☐	No ☐	Not Applicable ☑	

*VOA Preservation Checked After Sample Analysis

SPL Representative: _____ Contact Date & Time: _____

Client Name Contacted: _____

Non Conformance Issues: _____

Client Instructions: _____

Contact: Larry Campbell	Phone: (505)625-8022	Quarterly ☐	SPL Workorder Number: 07101-44
Address: 6381 North Main Street	Fax: (505) 627-8172	☐	
		WC-Waste Char. ☐	
City: Roswell	State: NM 88201	Other (describe below) ☒	
PO No.:			
Project Name: Roswell, NM		QA/QC Level	
Project No.:		Std ☒ Lvl 3 ☐	
Site Address: 6381 North Main Street, Roswell, NM		CLP ☐ Other ☐	
Sampled By:		Matrix	

SAMPLE ID	DATE	TIME	Water	Soil	Sludge	Wipe	Number Containers	Container Type	Preservative	PCB - Wipe	Flashpoint	TCLP - Metals	Benzene
CS91	10-30-07	1100 HRS				☒	1	4 oz		X	X	X	X

RUSH

FAX-TAT
SAME DAY ☒
48hr ☐
5 wd ☐ 10 wd ☐

Special Detection Limits (Specify):

Special Reporting Requirements (Specify):
TURNAROUND A.S.A.P

Consultant Remarks:

Laboratory Remarks:

4-5

PM review:

	date	time	
Relinquished by Sampler:	10-30-07	1045 HRS	Received by:
Relinquished by:	date	time	Received by:
Relinquished by:	date 10/31/7	time 1000	Received by SPL Inc.:

ATTACHMENT C
(MSDS of Chemicals at Facility)

U.S. DEPARTMENT OF LABOR
Occupational Safety and Health Administration

Form Approved
OMB No. 44-R1387

MATERIAL SAFETY DATA SHEET

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

SECTION I

MANUFACTURER'S NAME	EMERGENCY TELEPHONE NO.
[redacted] CHEMICALS CO.	(815) 942-7301
ADDRESS (Number, Street, City, State and ZIP Code) 8805 N. Tabler Road Morris, IL 60450-9988	
CHEMICAL NAME AND SYNONYMS Ethylene Glycol Antifreeze Coolant	TRADE NAME AND SYNONYMS NORKOOL® Concentrate Coolant
CHEMICAL FAMILY Dihydric Alcohol	FORMULA $HO-CH_2-CH_2-OH$

SECTION II - HAZARDOUS INGREDIENTS

PAINTS, PRESERVATIVES, & SOLVENTS	%	TLV (Units)	ALLOYS AND METALLIC COATINGS	%	TLV (Units)
PIGMENTS	0		BASE METAL	0	
CATALYST	0		ALLOYS	0	
VEHICLE	0		METALLIC COATINGS	0	
SOLVENTS	0		FILLER METAL PLUS COATING OR CORE FLUX	0	
ADDITIVES	0		OTHERS	0	
OTHERS	0				

HAZARDOUS MIXTURES OF OTHER LIQUIDS, SOLIDS, OR GASES	%	TLV (Units)
Ethylene Glycol	90	50 ppm (va
Other Glycols	5	N.A.
Proprietary inorganic and organic corrosion inhibitors	3	N.A.
Water	2	N.A.

SECTION III - PHYSICAL DATA

BOILING POINT (°F.)	325	SPECIFIC GRAVITY (H_2O=1)	1.134
VAPOR PRESSURE (mm Hg.)	N.A.	PERCENT, VOLATILE BY VOLUME (%)	N.A.
VAPOR DENSITY (AIR=1)	N.A.	EVAPORATION RATE (_____ =1)	N.A.
SOLUBILITY IN WATER	100%		
APPEARANCE AND ODOR	Blue liquid, no odor.		

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT (Method used) 250°F, Cleveland Open Cup	FLAMMABLE LIMITS N.A.	LEL	UEL
EXTINGUISHING MEDIA Water			
SPECIAL FIRE FIGHTING PROCEDURES None			
UNUSUAL FIRE AND EXPLOSION HAZARDS None			

(Continued on reverse side)

SECTION V - HEALTH HAZARD DATA

THRESHOLD LIMIT VALUE: 50 ppm (vapor)

EFFECTS OF OVEREXPOSURE: See Attached

EMERGENCY AND FIRST AID PROCEDURES: If swallowed, induce vomiting by giving two glasses of water and sticking finger down throat. Repeat until vomit fluid is clean. Call a physician.

SECTION VI - REACTIVITY DATA

STABILITY	UNSTABLE		CONDITIONS TO AVOID: None
	STABLE	X	

INCOMPATABILITY *(Materials to avoid)*

HAZARDOUS DECOMPOSITION PRODUCTS: CO, CO_2

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

SECTION VII - SPILL OR LEAK PROCEDURES

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED: Dilute with water

WASTE DISPOSAL METHOD: Incinerate or liquid disposal according to local, state, and federal regulations.

SECTION VIII - SPECIAL PROTECTION INFORMATION

RESPIRATORY PROTECTION *(Specify type)*: None required for normal use. For spill cleanup use NIOSH/MESA approved respirator for organic vapors up to 2%. Do not use if air contains less than 19.5% oxygen.

PROTECTIVE GLOVES

EYE PROTECTION: Goggles

OTHER PROTECTIVE EQUIPMENT

SECTION IX - SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING: Protect against extreme freezing conditions. Freeze point is approximately $0^{o}F$.

OTHER PRECAUTIONS: None

PREPARED BY: J. W. A. Butt

DATE: September 15, 1986

EFFECTS OF OVER EXPOSURE

Swallowing: Brain, kidney, liver damage, may be fatal.

Inhalation: Narcosis, nausea and vomiting.

Eye Contact: May cause minor eye irritation.

Skin: No effect.

FIRST AID

First Aid Procedures

Eyes: Irrigation of the eye immediately for five minutes is good safety practice.
Consult medical.

in: Wash off in flowing water. Decontaminate clothing and accessories before reuse. Good personal hygiene..

Inhalation: Remove to fresh air if effects occur. Consult medical.

Ingestion: Toxic by ingestion. Induce vomiting immediately. Call a physician and/or transport to emergency facility.

NOTE TO PHYSICIAN

Stain for evidence of corneal abrasion or injury. May cause neurologic signs and symptoms. May cause kidney damage. May cause electrolyte imbalance. Suggest baseline CBC, UA, and 12 test. Suggest baseline electrolytes. Consult standard literature. Use of alcohol may be helpful.

ExxonMobil

600114-00 MOBIL DTE 797 OIL
MATERIAL SAFETY DATA BULLETIN

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1. PRODUCT AND COMPANY IDENTIFICATION

PRODUCT NAME: MOBIL DTE 797 OIL
SUPPLIER: EXXONMOBIL OIL CORPORATION
3225 GALLOWS RD.
FAIRFAX, VA 22037

24 - Hour Health and Safety Emergency (call collect): 609-737-4411

24 - Hour Transportation Emergency:
CHEMTREC: 800-424-9300 202-483-7616
LUBES AND FUELS: 281-834-3296

Product and Technical Information:
Lubricants and Specialties: 800-662-4525 800-443-9966
Fuels Products: 800-947-9147
MSDS Fax on Demand: 713-613-3661
MSDS Internet Website: http://www.exxon.com, http://www.mobil.com

2. COMPOSITION/INFORMATION ON INGREDIENTS

CHEMICAL NAMES AND SYNONYMS: PET. HYDROCARBONS AND ADDITIVES

GLOBALLY REPORTABLE MSDS INGREDIENTS:

None.

See Section 8 for exposure limits (if applicable).

3. HAZARDS IDENTIFICATION

Under normal conditions of use, this product is not considered hazardous according to regulatory guidelines (See section 15).

EMERGENCY OVERVIEW: Straw Liquid. DOT ERG No. : NA

POTENTIAL HEALTH EFFECTS: Under normal conditions of intended use, this product does not pose a risk to health. Excessive exposure may result in eye, skin or respiratory irritation.

For further health effects/toxicological data, see Section 11.

---

4. FIRST AID MEASURES

EYE CONTACT: Flush thoroughly with water. If irritation occurs, call a physician.

SKIN CONTACT: Wash contact areas with soap and water. Remove and clean oil soaked clothing daily and wash affected area. (See Section 16 - Injection Injury)

INHALATION: Not expected to be a problem. However, if respiratory irritation, dizziness, nausea, or unconsciousness occurs due to excessive vapor or mist exposure, seek immediate medical assistance. If breathing has stopped, assist ventilation with a mechanical device or mouth-to-mouth resuscitation.

INGESTION: Not expected to be a problem. Seek medical attention if discomfort occurs. Do not induce vomiting.

---

5. FIRE-FIGHTING MEASURES

EXTINGUISHING MEDIA: Carbon dioxide, foam, dry chemical and water fog.

SPECIAL FIRE FIGHTING PROCEDURES: Water or foam may cause frothing. Use water to keep fire exposed containers cool. Water spray may be used to flush spills away from exposure. Prevent runoff from fire control or dilution from entering streams, sewers, or drinking water supply.

SPECIAL PROTECTIVE EQUIPMENT: For fires in enclosed areas, fire fighters must use self-contained breathing apparatus.

UNUSUAL FIRE AND EXPLOSION HAZARDS: None.

COMBUSTION PRODUCTS: Fumes, smoke, carbon monoxide, sulfur oxides, aldehydes and other decomposition products, in the case of incomplete combustion.

Flash Point C(F): > 207(405) (ASTM D-93).

Flammable Limits (approx.% vol.in air) - LEL: 0.9%, UEL: 7.0%

NFPA HAZARD ID: Health: 0, Flammability: 1, Reactivity: 0

---

6. ACCIDENTAL RELEASE MEASURES

NOTIFICATION PROCEDURES: Report spills/releases as required to appropriate authorities. U.S. Coast Guard and EPA regulations require immediate reporting of spills/releases that could reach any waterway including intermittent dry creeks. Report spill/release to Coast Guard National Response Center toll free number (800)424-8802. In case of accident or road spill notify CHEMTREC (800) 424-9300.

PROCEDURES IF MATERIAL IS RELEASED OR SPILLED:

LAND SPILL: Shut off source taking normal safety precautions. Take measures to minimize the effects on ground water. Recover by pumping or contain spilled material with sand or other suitable absorbent and remove mechanically into containers. If necessary, dispose of adsorbed residues as directed in Section 13.

WATER SPILL: Confine the spill immediately with booms. Warn other ships in the vicinity. Notify port and other relevant authorities. Remove from the surface by skimming or with suitable absorbents. If

permitted by regulatory authorities the use of suitable dispersants should be considered where recommended in local oil spill procedures.

ENVIRONMENTAL PRECAUTIONS: Prevent material from entering sewers, water sources or low lying areas; advise the relevant authorities if it has, or if it contaminates soil/vegetation.

PERSONAL PRECAUTIONS: See Section 8

---

7. HANDLING AND STORAGE

HANDLING: No special precautions are necessary beyond normal good hygiene practices. See Section 8 for additional personal protection advice when handling this product.

STORAGE: Keep containers closed when not in use. Do not store in open or unlabelled containers. Store away from strong oxidizing agents and combustible materials. Do not store near heat, sparks, flame or strong oxidants.

SPECIAL PRECAUTIONS: Prevent small spills and leakages to avoid slip hazard.

EMPTY CONTAINER WARNING: Empty containers retain residue (liquid and/or vapor) and can be dangerous. DO NOT PRESSURIZE, CUT, WELD, BRAZE, SOLDER, DRILL, GRIND OR EXPOSE SUCH CONTAINERS TO HEAT, FLAME, SPARKS, STATIC ELECTRICITY, OR OTHER SOURCES OF IGNITION; THEY MAY EXPLODE AND CAUSE INJURY OR DEATH. Do not attempt to refill or clean container since residue is difficult to remove. Empty drums should be completely drained, properly bunged and promptly returned to a drum reconditioner. All containers should be disposed of in an environmentally safe manner and in accordance with governmental regulations.

---

8. EXPOSURE CONTROLS/PERSONAL PROTECTION

OCCUPATIONAL EXPOSURE LIMITS:

When mists/aerosols can occur, the following are recommended: 5 mg/m3 (as oil mist)- ACGIH Threshold Limit Value (TLV), 10 mg/m3 (as oil mist) - ACGIH Short Term Exposure Limit (STEL), 5 mg/m3 (as oil mist) - OSHA Permissible Exposure Limit (PEL)

VENTILATION: If mists are generated, use adequate ventilation, local exhaust or enclosures to control below exposure limits.

RESPIRATORY PROTECTION: If mists are generated, and/or when ventilation is not adequate, wear approved respirator.

EYE PROTECTION: If eye contact is likely, safety glasses with side shields or chemical type goggles should be worn.

SKIN PROTECTION: Not normally required. When splashing or liquid contact can occur frequently, wear oil resistant gloves and/or other protective clothing. Good personal hygiene practices should always be followed.

---

9. PHYSICAL AND CHEMICAL PROPERTIES

Typical physical properties are given below. Consult Product Data Sheet

for specific details.

APPEARANCE: Liquid
COLOR: Straw
ODOR: Mild
ODOR THRESHOLD-ppm: NE
pH: NA
BOILING POINT C(F): > 316(600)
MELTING POINT C(F): NA
FLASH POINT C(F): > 207(405) (ASTM D-93)
FLAMMABILITY (solids): NE
AUTO FLAMMABILITY C(F): NA
EXPLOSIVE PROPERTIES: NA
OXIDIZING PROPERTIES: NA
VAPOR PRESSURE-mmHg 20 C: < 0.1
VAPOR DENSITY: > 2.0
EVAPORATION RATE: NE
RELATIVE DENSITY, 15/4 C: 0.86
SOLUBILITY IN WATER: Negligible
PARTITION COEFFICIENT: > 3.5
VISCOSITY AT 40 C, cSt: 30.4
VISCOSITY AT 100 C, cSt: 5.4
POUR POINT C(F): -7(20)
FREEZING POINT C(F): NE
VOLATILE ORGANIC COMPOUND: NE
DMSO EXTRACT, IP-346 (WT.%): <3, for mineral oil only
NA=NOT APPLICABLE NE=NOT ESTABLISHED D=DECOMPOSES

FOR FURTHER TECHNICAL INFORMATION, CONTACT YOUR MARKETING REPRESENTATIVE

---

10. STABILITY AND REACTIVITY

STABILITY (THERMAL, LIGHT, ETC.): Stable.
CONDITIONS TO AVOID: Extreme heat and high energy sources of ignition.
INCOMPATIBILITY (MATERIALS TO AVOID): Strong oxidizers.
HAZARDOUS DECOMPOSITION PRODUCTS: Product does not decompose at ambient temperatures.
HAZARDOUS POLYMERIZATION: Will not occur.

---

11. TOXICOLOGICAL DATA

---ACUTE TOXICOLOGY---

ORAL TOXICITY (RATS): Practically non-toxic (LD50: greater than 2000 mg/kg). ---Based on testing of similar products and/or the components.
DERMAL TOXICITY (RABBITS): Practically non-toxic (LD50: greater than 2000 mg/kg). ---Based on testing of similar products and/or the components.
INHALATION TOXICITY (RATS): Practically non-toxic (LC50: greater than 5 mg/l). ---Based on testing of similar products and/or the components.
EYE IRRITATION (RABBITS): Practically non-irritating. (Draize score: greater than 6 but 15 or less). ---Based on testing of similar products and/or the components.
SKIN IRRITATION (RABBITS): Practically non-irritating. (Primary

Irritation Index: greater than 0.5 but less than 3). ---Based on testing of similar products and/or the components.

OTHER ACUTE TOXICITY DATA: Although an acute inhalation study was not performed with this product, a variety of mineral and synthetic oils, such as those in this product, have been tested. These samples had virtually no effect other than a nonspecific inflammatory response in the lung to the aerosolized mineral oil. The presence of additives in other tested formulations (in approximately the same amounts as in the present formulation) did not alter the observed effects.

---SUBCHRONIC TOXICOLOGY (SUMMARY)---

No significant adverse effects were found in studies using repeated dermal applications of similar formulations to the skin of laboratory animals for 13 weeks at doses significantly higher than those expected during normal industrial exposure. The animals were evaluated extensively for effects of exposure (hematology, serum chemistry, urinalysis, organ weights, microscopic examination of tissues etc.).

---REPRODUCTIVE TOXICOLOGY (SUMMARY)---

No teratogenic effects would be expected from dermal exposure, based on laboratory developmental toxicity studies of major components in this formulation and/or materials of similar composition.

---CHRONIC TOXICOLOGY (SUMMARY)---

Repeated and/or prolonged exposure may cause irritation to the skin, eyes or respiratory tract. Overexposure to oil mist may result in oil droplet deposition and/or granuloma formation. For mineral base oils: Base oils in this product are severely solvent refined and/or severely hydrotreated. Chronic mouse skin painting studies of severely treated oils showed no evidence of carcinogenic effects. These results are confirmed on a continuing basis using various screening methods such as Modified Ames Test, IP-346, and/or other analytical methods. For synthetic base oils: The base oils in this product have been tested in the Ames assay and other tests of mutagenicity with negative results. These base oils are not expected to be carcinogenic with chronic dermal exposures.

---SENSITIZATION (SUMMARY)---

Not expected to be sensitizing based on tests of this product, components, or similar products.

---

12. ECOLOGICAL INFORMATION

ENVIRONMENTAL FATE AND EFFECTS:

In the absence of specific environmental data for this product, this assessment is based on information for representative products.

ECOTOXICITY: Available ectoxicity data (LL50 >1000 mg/L) indicates that adverse effects to aquatic organisms are not expected from this product.

MOBILITY: When released into the environment, adsorption to sediment and soil will be the predominant behavior.

PERSISTENCE AND DEGRADABILITY: This product is expected to be inherently biodegradable.

BIOACCUMULATIVE POTENTIAL: Bioaccumulation is unlikely due to the very low water solubility of this product, therefore bioavailability to aquatic organisms is minimal.

---

13. DISPOSAL CONSIDERATIONS

WASTE DISPOSAL: Product is suitable for burning in an enclosed, controlled burner for fuel value. Such burning may be limited pursuant to the Resource Conservation and Recovery Act. In addition, the product is suitable for processing by an approved recycling facility or can be disposed of at an appropriate government waste disposal facility. Use of these methods is subject to user compliance with applicable laws and regulations and consideration of product characteristics at time of disposal.

RCRA INFORMATION: The unused product, in our opinion, is not specifically listed by the EPA as a hazardous waste (40 CFR, Part 261D), nor is it formulated to contain materials which are listed hazardous wastes. It does not exhibit the hazardous characteristics of ignitability, corrosivity, or reactivity. The unused product is not formulated with substances covered by the Toxicity Characteristic Leaching Procedure (TCLP). However, used product may be regulated.

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14. TRANSPORT INFORMATION

USA DOT: NOT REGULATED BY USA DOT.

RID/ADR: NOT REGULATED BY RID/ADR.

IMO: NOT REGULATED BY IMO.

IATA: NOT REGULATED BY IATA.

STATIC ACCUMULATOR (50 picosiemens or less): YES

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15. REGULATORY INFORMATION

US OSHA HAZARD COMMUNICATION STANDARD: When used for its intended purposes, this product is not classified as hazardous in accordance with OSHA 29 CFR 1910.1200.

EU Labeling: Product is not dangerous as defined by the European Union Dangerous Substances/Preparations Directives. EU labeling not required.

Governmental Inventory Status: All components comply with TSCA, AICS and DSL.

U.S. Superfund Amendments and Reauthorization Act (SARA) Title III:
This product contains no "EXTREMELY HAZARDOUS SUBSTANCES".

SARA (311/312) REPORTABLE HAZARD CATEGORIES: None.

This product contains no chemicals subject to the supplier notification requirements of SARA (313) toxic release program.

THIS PRODUCT HAS BEEN AUTHORIZED BY USDA FOR USE UNDER THE FOLLOWING CATEGORY: This product is acceptable as a lubricant where there is no possibility of food contact (complies with earlier USDA guidelines for H-2 lubricant use).

The following product ingredients are cited on the lists below:

CHEMICAL NAME	CAS NUMBER	LIST CITATIONS *
*** NO REPORTABLE INGREDIENTS ***		

--- REGULATORY LISTS SEARCHED ---

1=ACGIH ALL	6=IARC 1	11=TSCA 4	16=CA P65 CARC	21=LA RTK
2=ACGIH A1	7=IARC 2A	12=TSCA 5a2	17=CA P65 REPRO	22=MI 293
3=ACGIH A2	8=IARC 2B	13=TSCA 5e	18=CA RTK	23=MN RTK
4=NTP CARC	9=OSHA CARC	14=TSCA 6	19=FL RTK	24=NJ RTK
5=NTP SUS	10=OSHA Z	15=TSCA 12b	20=IL RTK	25=PA RTK
				26=RI RTK

* EPA recently added new chemical substances to its TSCA Section 4 test rules. Please contact the supplier to confirm whether the ingredients in this product currently appear on a TSCA 4 or TSCA 12b list.
Code key:CARC=Carcinogen; SUS=Suspected Carcinogen; REPRO=Reproductive

16. OTHER INFORMATION

USE: STEAM TURBINE OIL

NOTE: PRODUCTS OF EXXON MOBIL CORPORATION AND ITS AFFILIATED COMPANIES ARE NOT FORMULATED TO CONTAIN PCBS.

Health studies have shown that many hydrocarbons pose potential human health risks which may vary from person to person. Information provided on this MSDS reflects intended use. This product should not be used for other applications. In any case, the following advice should be considered:

INJECTION INJURY WARNING: If product is injected into or under the skin, or into any part of the body, regardless of the appearance of the wound or its size, the individual should be evaluated immediately by a physician as a surgical emergency. Even though initial symptoms from high pressure injection may be minimal or absent, early surgical treatment within the first few hours may significantly reduce the ultimate extent of injury.

INDUSTRIAL LABEL

Under normal conditions of intended use, this product does not pose a risk to health. Excessive exposure may result in eye, skin or respiratory irritation. Always observe good hygiene measures. First Aid: Wash skin with soap and water. Flush eyes with water. If overcome by fumes or vapor, remove to fresh air. If ingested do not induce vomiting. If symptoms persist seek medical assistance. Read and understand the MSDS before using this product.

****
For Internal Use Only: MHC: 1* 1* 1* 1* 1*, MPPEC: A, TRN: 600114-00, CMCS97: 972965, REQ: US - MARKETING, SAFE USE: L
EHS Approval Date: 21AUG2001
****

Prepared by: ExxonMobil Oil Corporation
Environmental Health and Safety Department, Clinton, USA

Material Safety Data Sheet

May be used to comply with OSHA's Hazard Communication Standard, 29 CFR 1910.1200. Standard must be consulted for specific requirements.

U.S. Department of Labor
Occupational Safety and Health Administration
(Non-Mandatory Form)
Form Approved
OMB No. 1218-0072

IDENTITY (As Used on Label and List)
EPA 2000 Water Soluble (WCI-82)

Note: Blank spaces are not permitted. If any item is not applicable, or no information is available, the space must be marked to indicate that.

Section I

Manufacturer's Name Western Chemical International, Inc.	Emergency Telephone Number (602) 990-9487
Address (Number, Street, City, State, and ZIP Code) 2939 N. 67th Place Scottsdale, Arizona 85251	Telephone Number for Information (602) 990-9487
	Date Prepared 3/12/89
	Signature of Preparer (optional) M. Michaels

Section II — Hazardous Ingredients/Identity Information

Hazardous Components (Specific Chemical Identity; Common Name(s))	OSHA PEL	ACGIH TLV	Other Limits Recommended	% (optional)

NONE OF THE INGREDIENTS IN THIS FORMULATION ARE FOUND ON ANY LISTS OF HAZARDOUS, CARCINOGENIC OR BANNED CHEMICAL AGENTS OR MATERIALS GENERATED BY THEM. AGENCIES INVESTIGATED INCLUDE THE E.P.A., F.D.A., NATIONAL CANCER INSTITUTE, NATIONAL SCIENCE FOUNDATION, O.S.H.A. (FEDERAL AND CALIFORNIA), CONSUMER PRODUCT SAFETY COMMISSION, D.O.T. (SAFETY INSTITUTE AND SPECIAL PROGRAMS ADMINISTRATION), AND THE NATIONAL TOXICOLOGY PROGRAM. THE FORMULATION IS A TRADE SECRET AND COMPLIES WITH 29CFR XVII-1910.1200 SECTION (i) "TRADE SECRETS."

PRODUCT CONTAINS:

D- LIMONENE CAS# 5989-27-5

SURFACTANTS CAS# 2602-27-38-3

Section III — Physical/Chemical Characteristics

Boiling Point: greater than	340°F	Specific Gravity (H_2O = 1)	0.88
Vapor Pressure (mm Hg.)	N/A	Melting Point	5 at 100°C
Vapor Density (AIR = 1)	4.7	Evaporation Rate (Butyl Acetate = 1): Ether = 1	less than 1

Solubility in Water: Completely Soluble

Appearance and Odor: NONE VISCOUS LIQUID: COLOR: CLEAR TO LIGHT YELLOW. ODOR: CITRUS/PINE

Section IV — Fire and Explosion Hazard Data

Flash Point (Method Used): 118° F (TCC)	Flammable Limits	LEL: 0.7	UEL: 6.1

Extinguishing Media: DRY POWDER, FOAM, CO_2

Special Fire Fighting Procedures: CLASS B FIRE PROCEDURES

Unusual Fire and Explosion Hazards: KEEP AWAY FROM ALL SPARKS & OPEN FLAMES.

(Reproduce locally)

Section V — Reactivity Data

Stability			Conditions to Avoid
	Unstable		
	Stable	XX	Strong oxidizing agents, open flames, welding arcs.

Incompatibility (Materials to Avoid) NONE KNOWN OTHER THAN ABOVE

Hazardous Decomposition or Byproducts NONE KNOWN

Hazardous Polymerization			Conditions to Avoid
	May Occur		
	Will Not Occur	XX	POLMERIZATION CATALYSA SUCH AS ALUMINUM CHLORIDE

Section VI — Health Hazard Data

Route(s) of Entry: Inhalation? NOT IN NORMAL USE Skin? POSSIBLE IF OVER EXPOSURED Ingestion? NOT IN NORMAL USE

Health Hazards (Acute and Chronic) NONE IDENTIFIED

Carcinogenicity: NTP? NO IARC Monographs? NO OSHA Regulated? NO

Signs and Symptoms of Exposure
NONE UNDER NORMAL USAGE. SEVERE OVER EXPOSURE MAY, HOWEVER, RESULT IN EYES: IRRITATION, SKIN: POSSIBLE IRRITATION, INGESTION: NAUSEA, DIARRHEA:

Medical Conditions Generally Aggravated by Exposure NONE IDENTIFIED

Emergency and First Aid Procedures
EYES: FLUSH WITH WATER FOR 15 MINUTES: SKIN: WASH WITH SOAP& WATER FOR 15 MINUTES. INHALATION: REMOVE TO FRESH AIR. INGESTION: DRINK LARGE VOLUMES OF MILK OR OTHER LIQUID. CONSULT PHYSICIAN.

Section VII — Precautions for Safe Handling and Use

Steps to Be Taken in Case Material is Released or Spilled
FLUSH WITH VERY LARGE AMOUNTS OF WATER TO SEWER.

Waste Disposal Method SEWERAGE WITH FLUSH WHEN APPLICABLE WITHIN STATE, LOCAL, AND FEDERAL REGULATIONS.

Precautions to Be Taken in Handling and Storing
STORE AWAY FROM HEAT AND OPEN FLAMES. STORE IN SEALED ORIGINAL CONATINER IN COOL, DRY AREA

Other Precautions
KEEP AWAY FROM CHILDREN.

Section VIII — Control Measures

Respiratory Protection (Specify Type) NOT REQUIRED

Ventilation				
	Local Exhaust	ADEQUATE	Special	NONE
	Mechanical (General)	ADEQUATE	Other	NONE

Protective Gloves CHEMICAL RESISTANT **Eye Protection** SAFETY GLASSES, GOGGLES.

Other Protective Clothing or Equipment
NOT REQUIRED

Work/Hygienic Practices
AVOID SMOKING IN AREA. WASH BEFORE EATING. IF POSSIBLE HAVE EYE WASH IN VICINITY .

• USGPO: 1986-491-529/45775

MATERIAL SAFETY DATA SHEET: SIMPLE GREEN®

also for : SIMPLE GREEN® SCRUBBING PAD

I. PRODUCT & COMPANY INFORMATION

Version No. 10012
Issue Date: January 2006

PRODUCT NAME: SIMPLE GREEN® ALL-PURPOSE CLEANER
SIMPLE GREEN® CONCENTRATED CLEANER / DEGREASER / DEODORIZER
SIMPLE GREEN® SCRUBBING PAD

COMPANY NAME: SUNSHINE MAKERS, INC.
15922 Pacific Coast Highway
Huntington Harbour, CA 92649 USA
Telephone: 800-228-0709 • 562-795-6000
Fax: 562-592-3034
Website: www.simplegreen.com

For 24-hour emergency, call Chem-Tel, Inc.: 800-255-3924

USE OF PRODUCT: An all purpose cleaner and degreaser used diluted in water for direct, spray, and dip tank procedures. (Scrubbing pad is used with water for manual scrubbing applications.)

II. INGREDIENT INFORMATION

The only ingredient of Simple Green® with established exposure limits is undiluted 2-butoxyethanol (<6%) (Butyl Cellosolve; CAS No. 111-76-2): the ACGIH TLV-TWA is 20 ppm (97 mg/m^3).

Based upon chemical analysis, Simple Green® contains no known EPA priority pollutants, heavy metals, or chemicals listed under RCRA, CERCLA, or CWA. Analysis by TCLP (Toxicity Characteristic Leaching Procedure) according to RCRA revealed no toxic organic or inorganic constituents.

All components of Simple Green® are listed on the TSCA Chemical Substance Inventory.

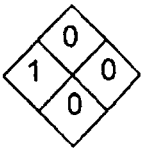
III. HAZARDS IDENTIFICATION

UN Number: Not required
Dangerous Goods Class: Nonhazardous

NJ TRADE SECRET REGISTRATION NUMBERS	
80100235-5000p	80100235-5005p
80100235-5001p	80100235-5006p
80100235-5002p	80100235-5007p
80100235-5003p	80100235-5008p
80100235-5004p	80100235-5009p

Hazard Rating (NFPA/HMIS)

Health = 1* Reactivity = 0
Fire = 0 Special = 0



Rating Scale

0 = minimal 1 = slight
2 = moderate 3 = serious
4 = severe

*Mild eye irritant, non-mutagenic and non-carcinogenic. **None of the ingredients in Simple Green® are regulated or listed as cancer agents by Federal OSHA, NTP, or IARC.**

IV. FIRST AID MEASURES

SYMPTOMS OF OVEREXPOSURE AND FIRST AID TREATMENT

Eye contact: Reddening may develop. Immediately rinse the eye with large quantities of cool water; continue 10-15 minutes or until the material has been removed; be sure to remove contact lenses, if present, and to lift upper and lower lids during rinsing. Get medical attention if irritation persists.

Skin contact: Minimal effects, if any; rinse skin with water, rinse shoes and launder clothing before reuse. Reversible reddening may occur in some dermal-sensitive users; thoroughly rinse area and get medical attention if reaction persists.

Swallowing: Essentially non-toxic. Give several glasses of water to dilute; do not induce vomiting. If stomach upset occurs, consult physician.

Inhalation: Non-toxic. Exposures to concentrate-mist may cause mild irritation of nasal passages or throat; remove to fresh air. Get medical attention if irritation persists.

V. FIRE FIGHTING MEASURES

Simple Green® is stable, not flammable, and will not burn.

Flash Point/Auto-Ignition:	Not flammable.
Flammability Limits:	Not flammable.
Extinguishing Media:	Not flammable/nonexplosive. No special procedures required.
Special Fire Fighting Procedures:	None required.

VI. ACCIDENTAL RELEASE MEASURES

Recover usable material by convenient method; residual may be removed by wipe or wet mop. If necessary, unrecoverable material may be washed to drain with large quantities of water.

VII. HANDLING, STORAGE & TRANSPORT INFORMATION

No special precautions are required. **This product is non-hazardous for storage and transport according to the U.S. Department of Transportation Regulations.** Simple Green® requires no special labeling or placarding to meet U.S. Department of Transportation requirements.

UN Number: Not required Dangerous Goods Class: Non-hazardous

VIII. EXPOSURE CONTROLS

Exposure Limits: The Simple Green® formulation presents no health hazards to the user when used according to label directions for its intended purposes. Mild skin and eye irritation is possible (please see Eye contact and Skin contact in Section IV.).

Ventilation: No special ventilation is required during use.

Human Health Effects or Risks from Exposure: Adverse effects on human health are not expected from Simple Green®, based upon twenty years of use without reported adverse health incidence in diverse population groups, including extensive use by inmates of U.S. Federal prisons in cleaning operations.

Simple Green® is a mild eye irritant; mucous membranes may become irritated by concentrate-mist.

Simple Green® is not likely to irritate the skin in the majority of users. Repeated daily application to the skin without rinsing, or continuous contact of Simple Green® on the skin may lead to temporary, but reversible, irritation.

Medical Conditions Aggravated by Exposure: No aggravation of existing medical conditions is expected; dermal sensitive users may react to dermal contact by Simple Green®.

IX. PERSONAL PROTECTION

Precautionary Measures:	No special requirements under normal use conditions.
Eye Protection:	**Caution, including reasonable eye protection, should always be used to avoid eye contact where splashing may occur.**
Skin Protection:	No special precautions required; rinse completely from skin after contact.
Respiratory Protection:	No special precautions required.
Work and Hygienic Practices:	No special requirements. Wash or rinse hands before touching eyes or contact lenses.

X. PHYSICAL AND CHEMICAL PROPERTIES

Appearance/odor: Translucent green liquid with characteristic sassafras odor. (Scrubber is green fibrous rectangle.)

Specific Gravity:	1.0257	**Vapor Pressure:**	17 mm Hg @ 20 °C; 22 mm Hg @ 25 °C
pH of concentrate:	9.5	**Vapor Density:**	1.3 (air = 1)
Evaporation:	>1 (butyl acetate = 1)	**Density:**	8.5 lbs./gallon
Boiling Point:	110 °C (231 °F)		
Freezing Point:	-9 °C (16 °F) If product freezes, it will reconstitute without loss of efficacy when brought back to room temperature and agitated.		

VOC Composite Partial Pressure: 0.006 mm Hg @ 20 °C

Volatile Organic Compounds (VOCs): 7.96 g/L per ASTM Method 3960-90. Per EPA Method 24, VOCs are 5.9% and product must be diluted at least 1 part of water to 1 part Simple Green® in order to meet CARB 2005 VOC regulations -or 1 part Simple Green to 3 parts water to meet SCAQMD Rule 1171 & Rule 1122 and BAAQMD Regulation 8-16 VOC requirements for solvent cleaning operations.

Water Solubility: Completely soluble in water. The higher salt concentrations in marine ecosystems will lead to complexes with Simple Green® that may become visible at ratios above one part Simple Green® to 99 parts seawater.

Ash Content: At 600 °F: 1.86% by weight.

Nutrient Content: Nitrogen: <1.0% by weight (fusion and qualitative test for ammonia).
Phosphorus: 0.3% by formula.
Sulfur: 0.6% by weight (barium chloride precipitation method).

Detection: Simple Green® has a characteristic sassafras odor that is not indicative of any hazardous situation.

XI. STABILITY AND REACTIVITY INFORMATION

Nonreactive. Simple Green® is stable, even under fire conditions, and will not react with water or oxidizers. Hazardous polymerization will not occur.

XII. TOXICOLOGICAL INFORMATION

Nonhuman Toxicity

Acute Mortality Studies:
Oral LD_{50} (rat): >5.0 g/kg body weight // Dermal LD_{50} (rabbit): >2.0 g/kg body weight

Dermal Irritation: Only mild, but reversible, irritation was found in a standard 72-hr test on rabbits. A value of 0.2 (non-irritating) was found on a scale of 8.

Eye Irritation: With or without rinsing with water, the irritation scores in rabbits at 24 hours did not exceed 15 (mild irritant) on a scale of 110.

Subchronic dermal effects: No adverse effects, except reversible dermal irritation, were found in rabbits exposed to Simple Green® (up to 2.0 g/kg/day for 13 weeks) applied to the skin of 25 males and 25 females. Only female body weight gain was affected. Detailed microscopic examination of all major tissues showed no adverse changes.

Fertility Assessment by Continuous Breeding: The Simple Green® formulation had no adverse effect on fertility and reproduction in CD-1 mice with continuous administration for 18 weeks, and had no adverse effect on the reproductive performance of their offspring.

XIII. BIODEGRADABILITY AND ENVIRONMENTAL TOXICITY INFORMATION

Biodegradability:
Simple Green® is readily decomposed by naturally occurring microorganisms. The biological oxygen demand (BOD), as a percentage of the chemical oxygen demand (COD), after 4, 7, and 11 days was 56%, 60%, and 70%, respectively. Per OECD Closed Bottle Test, Simple Green® meets OECD and EPA recommendations for ready biodegradability.
In a standard biodegradation test with soils from three different countries, Butyl Cellosolve reached 50% degradation in 6 to 23 days, depending upon soil type, and exceeded the rate of degradation for glucose which was used as a control for comparison.

Environmental Toxicity Information:
Simple Green® is considered practically non-toxic per EPA's aquatic toxicity scale. Simple Green® is non-lethal to any of the marine and estuarine test animals listed in the following table at concentrations below 200 mg/L (0.02%). This table shows the Simple Green® concentrations that are likely to be lethal to 50% of the exposed organisms.

	LC_{50} in mg/L (ppm)	
	48-hour	96-hour
Marine Fish:		
Mud minnow *(Fundulus heteroclitus)*	1690	1574
Whitebait *(Galaxias maculatus)*	210	210
Marine/Estuarine Invertebrates:		
Brine Shrimp *(Artemia salina)*	610	399
Grass Shrimp *(Palaemonetes pugio)*	270	220
Green-lipped Mussel *(Perna canaliculus)*	220	220
Mud Snail *(Potamopyrgus estuarinus)*	410	350

XIV. DISPOSAL CONSIDERATIONS

Simple Green® is fully water soluble and biodegradable and will not harm sewage-treatment microorganisms if disposal by sewer or drain is necessary. Dispose of in accordance with all applicable local, state, and federal laws.

XV. OTHER INFORMATION

Containers: Simple Green® residues can be completely removed by rinsing with water; the container may be recycled or applied to other uses.

Electrical Wiring Compatibility: Polyimide insulated wiring is not affected by exposure to Simple Green®. After immersion in Simple Green® for 14 days at 74°F, the 61 cm piece of polyamide insulated wire passed a one minute dielectric proof test at 2500 volts (ASTM D-149).

Contact Point: Sunshine Makers, Inc., Research and Development Division: 562-795-6000.

National Stock Numbers:

PART#	NSN	SIZE	PART#	NSN	SIZE
13012	7930-01-342-5315	24 oz. spray (12/cs)	13016	7930-01-342-5317	15 gal.
13005	7930-01-306-8369	1 gal. (6/cs)	13008	7930-01-342-4145	55 gal.
13006	7930-01-342-5316	5 gal.	Scrubbing Pad: 10224	7930-01-346-9148	Each (24/cs)

***** NOTICE *****

All information appearing herein is based upon data obtained by the manufacturer & recognized technical sources. Judgments as to the suitability of information herein for purchaser's purposes are necessarily purchaser's responsibility. Therefore, although reasonable care has been taken in the preparation of this information, Sunshine Makers, Inc. or its distributors extends no warranties, makes no representations and assumes no responsibility as to the suitability of such information for application to purchaser's intended purposes or for consequences of its use.

MATERIAL SAFETY DATA SHEET
Natural Gas Condensate

Energy Transfer Company
800 E. Sonterra Blvd. #400
San Antonio, Texas 78258

Company Contact: . . . . . .Gas Control – (800) 392-1965 or 800-375-5702
Emergency Contact: . . . . . Chemtrec - (800) 424-9300

SECTION #1 - IDENTIFICATION

Product:	Natural Gas Condensate
CAS Number:	64741-47-5
Chemical Family:	Hydrocarbon, aliphatic
Synonyms:	Condensate, Field Liquids, Natural Gas Liquids

SECTION #2 - HAZARDOUS CHEMICAL COMPONENTS

Weight %	Material	CAS#	Exposure Limit
~99	Natural Gas Condensate, mixture of aliphatic hydrocarbons, C2-9		300 ppm TWA, 500 STEL ACGIH & OSHA (as compared to gasoline)
<1	Benzene	71-43-2	1 ppm TWA, OSHA 5 ppm STEL, OSHA
<1	Toluene	108-88-3	100 ppm TWA, OSHA & ACGIH 150 ppm STEL, OSHA & ACGIH
<1	Cyclohexane	110-82-7	300 ppm TWA, ACGIH & OSHA
<2	Methylcyclohexane	108-87-2	400 ppm TWA, OSHA & ACGIH
<5	Xylenes (mixed isomers)	1330-20-7	100 ppm TWA, OSHA 150 ppm STEL, OSHA
<1	Ethyl Benzene	100-41-4	100 ppm TWA, OSHA & ACGIH 125 ppm TWA, OSHA & ACGIH

SECTION #3 - PHYSICAL DATA

Boiling Point:	<80 - 665 ^{0}F
Vapor Pressure:	Varies
Vapor Density (Air = 1):	3 to 4
Specific Gravity:	0.5 - 0 .6
Solubility (H_2O):	Negligible
Evaporation Rate:	Not Determined
Appearance:	Clear to white colored liquid
Odor:	Ranges from mild, pleasant hydrocarbon to pungent offensive, strong sulfurous odor

SECTION #4 - FIRE FIGHTING & EXPLOSION DATA

Flash Point:	<0 ^{0}F (-17 ^{0}C) Varies
Autoignition:	500 ^{O}F
Flammable Limits in Air:	0.4% (lower) 11 % (upper)
Unusual Fire and Explosion Hazards:	Vapors form from this product and may travel or be moved by air currents and ignited by pilot lights, other flames, smoking, sparks, heaters, electrical equipment, static discharges or other ignition sources at locations distant from product handing point. Vapors from this material may settle in low or confined areas or travel a long distance to an ignition source and flash back explosively. This material may produce a floating hazard.
Extinguishing Media:	Apply alcohol-type or all-purpose-type foam by manufacturer's recommended techniques for large fires. Use carbon dioxide or dry chemical media for small fires.
Special Fire Fighting Instructions:	Use water spray to cool fire-exposed containers and structures. Use remote spray monitors or fight fire from behind shields. Use water spray to disperse vapors; re-ignition is possible. Use protective clothing, eye protection and have self-contained breathing apparatus available.

SECTION #5 - HEALTH HAZARD DATA

Exposure Limits:	See Section # 2.
Effects of Single Overexposure:	
Swallowing:	Abdominal discomfort, nausea and vomiting may occur. Aspiration into the lungs may occur during ingestion or vomiting, resulting in lung injury.
Skin Absorption:	Prolonged or widespread contact may result in absorption of potentially harmful amounts of material.
Inhalation:	Causes irritation to the respiratory tract, experienced as nasal discomfort and discharge, with chest paint, coughing, headache, nausea, vomiting, dizziness, drowsiness, disturbed vision and unconsciousness. Liver and kidneys damage may occur. Blood damage may occur. Depression of bone marrow activity may occur.
Skin Contact:	Causes irritation with discomfort and local redness. Prolonged or repeated contact may cause defatting and drying of the skin.
Eye Contact:	May cause irritation, experienced as stinging with excess blinking and tear production. Excess redness of the conjunctiva may occur.
Effects of Repeated Overexposure:	Benzene is a known human carcinogen. May cause various blood disorders, including anemia and leukemia. Effects of chronic exposure may be delayed. Benzene is included in the IARC, NTP, and OSHA lists of carcinogens. Prolonged exposure can cause dizziness, weakness, weight loss, anemia, a feeling of agitation, plus pain, numbness, and a tingling sensation in the limbs. The red blood cell count may be reduced, bone marrow may be hypolastic, and hematuria may be found. Skin irritation can occur.

SECTION #5 - HEATH HAZARD DATA - (continued)

Medical Conditions Aggravated by Overexposure:	Skin contact may aggravate existing dermatitis. Inhalation of material may aggravate asthma and inflammatory or fibrotic pulmonary disease.
Signification Laboratory Data with Possible Relevance to Human Health Hazard Evaluation:	Benzene has been shown to cause embryofetal toxicity and birth defects in laboratory animals, but only at doses which also cause maternal toxicity. Unleaded gasoline is a suspected carcinogen with experimental carcinogenic data.
Emergency and First Aid Procedures:	
Swallowing:	Do not induce vomiting. Do not give anything to drink. Obtain medical attention without delay.
Skin:	Remove contaminated clothing. Wash skin with soap and water. Obtain medical attention if irritation persists. Wash clothing before reuse.
Inhalation:	Remove to fresh air. Give artificial respiration if not breathing. If breathing is difficult, oxygen may be given by qualified personnel. Obtain medical attention urgently. If exposure is sever, hospitalize and observe. Treatment for pulmonary edema and hemorrhage may be required.
Eyes:	Immediately flush eyes with water and continue washing for several minutes. Obtain medical attention.

SECTION #6 - REACTIVITY & POLYMERIZATION

Stability:	Stable
Conditions to Avoid:	Contact with excessive heat, open flame, sparks, or ignition sources.
Incompatibility (materials to avoid):	Strong oxidizing agents. Avoid halogens (chlorine) in the presence of sunlight or ultraviolet light, concentrated oxygen, sodium or calcium hydrochloride.
Hazardous Combustion or Decomposition Products:	Forms carbon monoxide and carbon dioxide during combustion along with thick black smoke. Sulfur compounds present may result in the emission of H_2S.
Hazardous Polymerization:	Does not occur.

SECTION #7 - SPILL, LEAK, & DISPOSAL PROCEDURES

Steps to be Taken in the Event of Spills, Leaks, or Release:	Eliminate all ignition sources. Eliminate source of release or spill if possible. Contain spill to smallest area possible. Use absorbent materials on small spills. Avoid runoff to sewers or waterways. Notify fire department.
Waste Disposal Procedures:	Spills, once contained, should be picked up for reuse or disposal in accordance with local, state and federal laws and regulations.
Other Environmental Information:	Report spills to appropriate authorities. In case of an accident or road spill, notify Chemtrec (1-800-424-9300). If spill could reach any waterway including intermittent dry stream beds, immediate notification to the National Response Center (1-800-424-8802) is required.

SECTION # 8 - SPECIAL PROTECTION MEASURES

Ventilation:	Local exhaust in closed areas. Mechanical (general) - Use of explosion proof electrical equipment - Class 1, Group D.
Eye Protection:	Chemical splash goggles should be worn to protect eyes from vapors and splashes.
Skin Protection:	Use Neoprene or Nitrile gloves and protective clothing to prevent skin contact.
Respiratory Protection:	Use organic vapor cartridge respiration or gas mask for exposures over TLV. Self-contained breathing apparatus or air supplied breathing equipment is recommended for exposures over 1000 ppm.
Work/Hygiene Practices:	A safety shower and eye wash is recommended in the area of use.

SECTION #9 - SPECIAL PRECAUTIONS - STORAGE & HANDLING

Storage and Handling Conditions:	Store outside if possible. Store in closed containers. Containers must be electrically grounded and bonded for transfer of liquid. Do not handle or store near heat, sparks, flame, or strong oxidants. Ventilation must be sufficient to prevent breathing vapors.
Hydrogen Sulfide (H_2S):	This product may contain Hydrogen Sulfide (H_2S). Exposure limits for H_2S are: 10 ppm TWA and 15 ppm STEL, OSHA and ACGIH.
Naturally Occurring Radioactive Material (NORM):	This product may contain Naturally Occurring Radioactive Material (NORM) and customers should be aware of the potential for NORM within their processing system. The actual concentration of NORM in the product is dependent on the geographical source of the natural gasoline and storage time prior to its delivery. Process equipment (e.g., lines, filters, pumps and reaction units) may accumulate radioactive daughters and emit gamma radiation during operation. Equipment emitting gamma radiation may be presumed to be internally contaminated with alpha-emitting decay products which may be a hazard if inhaled or ingested. Consult applicable NORM regulations for worker protection guidelines and handling requirements before initiating maintenance operations which require opening contaminated equipment.

SECTION #10 - SHIPPING INFORMATION

Proper Shipping Name:	Flammable Liquid N.O.S. (Condensate, Field Liquids)
Hazard Class:	3
DOT Identification Number:	UN1993.
DOT Shipping Label:	Flammable Liquid
Packing Group:	II

SECTION #11 - REGULATORY INFORMATION

Any spill or uncontrolled release of this product, including any substantial threat of release, may be subject to state and federal reporting requirements. Consult those regulations applicable to your facility or operation.

SECTION #11 - REGULATORY INFORMATION - (continued)

Federal Clean Water Act:

Any spill or release of this product into "navigable waters" (essentially any surface water, including certain wetlands) or adjoining shorelines sufficient to cause a visible sheen or deposit a sludge or emulsion must be reporting immediately to the National Response Center (1-800-424-8802). Also contact appropriate state and local regulatory agencies as required.

CERCLA Section 103:

The Comprehensive Environmental Response Compensation and Liability Act of 1980 (CERCLA) requires notification to the National Response Center of a release of quantities of Hazardous Substances equal to or greater than the reportable quantities in 40 CFR §302.4. The CERCLA definition of hazardous substances contains a "petroleum exclusion" clause which exempts natural gas liquids and any indigenous components of such (e.g., benzene) from the CERCLA Section 103 reporting requirements.

EPCRA Section 304:

The Emergency Planning and Community Right-to-Know Act (EPCRA) requires emergency planning based on Threshold Planning Quantities and release reporting based on reportable quantities in 40 CFR §355. There are no known components present in this product that would require reporting under this statute.

EPCRA Sections 311/312:

The Emergency Planning and Community Right-to-Know Act (EPCRA) requires notification and annual reporting of materials for which maintenance of an MSDS is required. This product is classified under the following hazard categories: Immediate Health Hazard, Delayed Health Hazard and Fire Hazard.

EPCRA Section 313:

The Emergency Planning and Community Right-to-Know Act (EPCRA) requires submission of annual reports of the release of toxic chemicals that appear in 40 CFR §372. Components present in this product a level which could require reporting under this statute are:

CHEMICAL	CAS NUMBER	UPPER BOUND CONCENTRATION IN %
Benzene	71-43-2	<1
Cyclohexane	110-82-82-7	<1
Toluene	108-88-3	<1
Ethyl Benzene	100-41-4	<1
Xylenes (mixed isomers)	1330-20-7	<5

Toxic Substances Control (TSCA) Status:

The ingredients of this product are on the TSCA inventory.

DISCLAIMER OF EXPRESSED AND IMPLIED WARRANTIES

This information relates only to the material designed and may not be valid for such material used in combination with other materials or in any process. Such information is to the best of this Company's knowledge believed accurate and reliable as of the date indicated. However, no representation, warranty or guarantee is made as to its accuracy, reliability or completeness. It is the user's responsibility to satisfy himself as to the suitableness and completeness of such information for his own particular use.

ATTACHMENT D
(Approval Letter from OCD for Drainline Testing)

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

July 16, 1997

CERTIFIED MAIL
RETURN RECEIPT NO. P-326-936-636

Mr. Larry Campbell
Division Environmental Specialist
Transwestern Pipeline Company (TWPC)
6381 North Main
Roswell, NM 88201

RE: Approval of Methods for Underground Drain Line Testing
TWPC(New Mexico Facilities) Compressor Stations

Dear Mr. Campbell:

The OCD has received the letter dated July 8, 1997 from TWPC titled "Approval Methodology Request for Underground Drain Line Testing." Based on the testing method proposed the OCD hereby approves of this procedure for TWPC facilities that are currently permitted under discharge plans by the OCD.

This approval is subject to the condition that the OCD Santa Fe Office be notified 72 hours in advance of any testing.

Please note, OCD approval of this test procedure dues not relieve TWPC from liability should groundwater contamination result from this procedure. OCD approval also does not relieve TWPC from responsibility to comply with other federal, state, and local rules and regulations that may apply.

If TWPC has any questions regarding this matter please feel free to contact me at (505)-827-7152.

Sincerely,

Roger C. Anderson
Environmental Bureau Chief - OCD

c: OCD District Offices.

FAX (505) 625-8060

Phone (505) 623-2761

Transwestern Pipeline Company
TECHNICAL OPERATIONS
6381 North Main • Roswell, New Mexico 88201

July 8, 1997

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

Re: Approval Methodology Request for Underground Drain Line Testing

Dear Mr. Anderson:

Transwestern Pipeline Company (Transwestern), presents the following methodology to test the integrity of underground process /wastewater line drain testing at compressor station facilities currently under approved OCD discharge plans. This proposed testing methodology, if approved by your agency, will be implemented at all compressor stations which are owned and operated by Transwestern which are currently under an approved OCD discharge plan drain line testing requirement.

Under this testing program, Transwestern proposes to conduct a thirty minute pressure testing of each drain line at a testing pressure of 3 pounds per square inch (psi) above normal or ambient operating pressure. Each underground drain line to be tested will be isolated from all other drain lines. The test will be conducted at its origination or at the point where the drain line exits the building foundation or secondary containment. A plug or stopper will be inserted at one end of the drain line and sealed to prevent water leakage. The other end of the drain line will be engineered and designed with a water tight 90 degree piping elbow. A vertical pipe extension will be constructed and tap water added to fill the drain line and vertical pipe to a height which will allow a 3 psi pressure on the drain line system. The following equation was used to determine the height of water to be placed into the system

Feet of head = Pressure (psi) X 2.31/ specific gravity

specific gravity of water = 1.0

(3 x 2.31)/1 = 6.95 feet

This equation was taken from the Pipeline Rule of Thumb Book, 3rd edition, Gulf Publishing Company, page 293.
Transwestern proposes to conduct pressure testing on each underground drain line at each compressor station covered under an approved discharge plan. At the beginning of each thirty minute time period, Transwestern will mark on the vertical pipe at the 6.95 foot water level. Upon conclusion the thirty minute period, Transwestern will record the water level height. A report will be prepared and submitted to the OCD within 45 days of completing the study at each compressor station, depicting the results of the pressure testing.

Transwestern requests favorable consideration and approval of this pressure testing study proposal. Should you require any additional information, contact the undersigned at our Roswell Technical Operations office at (505) 625-8022.

Sincerely,

Larry Campbell

Larry Campbell
Division Environmental Specialist

xc: Rich Jolly
Butch Russell
file

ATTACHMENT E
(Reporting Protocol for Spills and Releases)

Subject: New Mexico Energy Minerals and Natural Resources Department, OCD, Amended Rule 116 - Release Reporting
Date: April 17, 1997
Reference: February 13, 1997 Order No. R-10766
Status: Amended Rule **Effective Date:** February 13, 1997

SUMMARY: The New Mexico Oil Conservation Division (OCD) amended Rule 116 that covers "Notification of Fires, Breaks, Leaks, Spills and Blowouts." The amended Rule requires reporting of all *unauthorized* releases of any oil and gas product, produced water, oil field waste (including Regulated NORM), and oil field chemicals. New Mexico's existing rules require an entity to report releases that are anticipated, such as those from scheduled maintenance activities (e.g., pipeline blowdown). When prior notice is given under these existing rule, the releases are "authorized." Rule 116 also requires reporting of *any* release (even authorized releases) that may "with reasonable probability be detrimental to water or cause an exceedance of" the state water quality standards (e.g., hydrostatic test water discharge that is of a poorer quality than expected and could be detrimental to the receiving stream's water quality). The Rule categorizes releases into "Major" and "Minor." Major releases require "immediate verbal notification" and "timely written notice," whereas, Minor releases require "timely written notice." Lastly, when appropriate, the responsible person must remediate the release according to an OCD-approved action plan. Impact: Enron companies conducting business in New Mexico will have to report more releases. The main increase in reporting is likely to be for releases of natural gas.. Also, the spill response procedure manual must be updated. Recommended Action: The Environmental Team must update the spill response procedure manual. Division Environmental Specialists and other appropriate environmental staff that are responsible for activities in New Mexico should familiarize themselves with the amended Rule so that appropriate notifications will be made until the revised procedure is completed.

NOTIFICATION Amended Rule 116 requires that the OCD be notified whenever an *unauthorized* release of virtually any material related to oil and gas "drilling, producing, storing, disposing, injecting, transporting, servicing or processing," including "Regulated NORM," occurs. (See definitions of "Major" and "Minor" releases below for further clarification.) Generally, *authorized* releases are those that are permitted (e.g., NPDES) or those for which the appropriate agency has received prior notification, such as for air to releases associated with scheduled maintenance activities, are not reportable under Rule 116. However, even *authorized* releases must be reported if the *authorized* release is of "oil or other water contaminant" that "may with reasonable probability be detrimental to water or cause an exceedance of the" State water quality standards. Since the New Mexico Environment Department has prime jurisdiction over air pollution, reporting of unanticipated problems or amounts of *air* pollutants is also regulated by them at NMAQCR §801.

DEFINITIONS OF MAJOR AND MINOR RELEASES Rule 116 divides releases into two categories.

Major Releases are defined as:

a. an unauthorized release (excluding natural gases) in excess of 25 barrels;
b. an unauthorized release of any quantity that:
   1. results in a fire;
   2. will reach a water course;

3. may with reasonable probability endanger public health; or
4. results in substantial damage to property or the environment;

c. an unauthorized release of natural gases in excess of 500 mcf; or

d. a release of any volume that will likely be detrimental to water or cause an exceedance of State water quality standards.

Minor Releases are defined as:

a. an unauthorized release (excluding natural gases) in excess of 5 barrels but not more than 25 barrels or

b. an unauthorized release of natural gases exceeding 50 mcf but less than 500 mcf.

REPORTING OF MAJOR AND MINOR RELEASES

Major Releases must be reported by giving **immediate verbal notice** and **timely written notice,** as described below.

Minor Releases must be reported by giving **timely written notice,** as described below.

Immediate Verbal Notification indicates those situations that must be reported within 24 hours of discovery to the Division District Office for the area where the release took place. Also, if the release may be detrimental to water or cause an exceedance of the State water quality standards, **immediate verbal notification** must be provided to the Division's Environmental Bureau Chief. When providing this verbal notification, the information required on Division Form C-141 must be provided. A copy of Form C-141 is attached.

Timely Written Notification consists of reporting within 15 days to the Division District Office and, where the release may have been detrimental to water or caused an exceedance of the State water quality standards, to the Division's Environmental Bureau Chief. **Timely written notification** is accomplished by completing **Form C-141.** The written notification should verify the prior verbal notification along with updating and/or correcting information contained in the verbal notification.

CORRECTIVE ACTION The entity responsible for the release must take appropriate **corrective action** when public health or the environment are endangered. The corrective action must be done according to a remediation plan or an abatement plan that has been approved by the Division.

The **SUMMARY** has been distributed to appropriate management personnel. If there are any questions concerning this regulation, contact Joe Kolb at 713/646-6180.

Attachments

Distribution List:
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District IV - (505) 827-7131

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

Form C- 141
Originated 2/13/97

Submit 2 copies to Appropriate District Office in accordance with Rule 116 on back side of form

Release Notification and Corrective Action

OPERATOR

☐ Initial Report ☐ Final Report

Name	Contact
Address	Telephone No.
Facility Name	Facility Type

Surface Owner	Mineral Owner	Lease No.

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County

NATURE OF RELEASE

Type of Release	Volume of Release	Volume Recovered
Source of Release	Date and Hour of Occurrence	Date and Hour of Discovery
Was Immediate Notice Given? ☐ Yes ☐ No ☐ Not Required	If YES, To Whom?	
By Whom?	Date and Hour	
Was a Watercourse Reached? ☐ Yes ☐ No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*

Describe Area Affected and Cleanup Action Taken.*

Describe General Conditions Prevailing (Temperature, Precipitation, etc.).*

I hereby certify that the information given above is true and complete to the best of my knowledge and belief. Signature:	OIL CONSERVATION DIVISION	
Printed Name:	Approved by District Supervisor:	
Title:	Approval Date:	Expiration Date:
Date: Phone:	Conditions of Approval:	Attached ☐

* Attach Additional Sheets If Necessary

ATTACHMENT F

(OCD Guidelines for Remediation of Leaks, spills and Releases)

GUIDELINES

FOR

REMEDIATION

OF

LEAKS, SPILLS AND RELEASES

(AUGUST 13, 1993)

New Mexico Oil Conservation Division
State Land Office Building
P.O. Box 2088
Santa Fe, New Mexico 87504-2088

TABLE OF CONTENTS

INTRODUCTION

The following document is to be used as a **guide** on all federal, state and fee lands when remediating contaminants resulting from leaks, spills and releases of oilfield wastes or products. The New Mexico Oil Conservation Division (OCD) requires that corrective actions be taken for leaks, spills or releases of any material which has a reasonable probability to injure or be detrimental to public health, fresh waters, animal or plant life, or property or unreasonably interfere with the public welfare or use of the property. These guidelines are intended to provide direction for remediation of soils and fresh waters contaminated as a result of leaks, spills or releases of oilfield wastes and products in a manner that assures protection of fresh waters, public health and the environment.

Fresh waters (to be protected) includes the water in lakes, playas, surface waters of all streams regardless of the quality of the water within any given reach, and all underground waters containing 10,000 milligrams per liter (mg/l) or less of total dissolved solids (TDS) except for which, after notice and hearing, it is found that there is no present or reasonably foreseeable beneficial use which would be impaired by contamination of such waters. The water in lakes and playas shall be protected from contamination even though it may contain more than 10,000 mg/l of TDS unless it can be shown that hydrologically connected fresh ground water will not be adversely affected.

Procedures may deviate from the following guidelines if it can be shown that the proposed procedure will either remediate, remove, isolate or control contaminants in such a manner that fresh waters, public health and the environment will not be impacted. Specific constituents and/or requirements for soil and ground water analysis and/or remediation may vary depending on site specific conditions. Deviations from approved plans will require OCD notification and approval.

****** Note:** **Notification to OCD of leaks, spills and releases does not relieve an operator of responsibility for compliance with any other federal, state or local law and/or regulation regarding the incident. Other agencies (ie. BLM, Indian Tribes, etc) may also have guidelines or requirements for remediation of leaks spills and releases.**

I. NOTIFICATION OF LEAK, SPILL OR RELEASE

Leaks, spills and releases of any wastes or products from oilfield operations are required to be reported to the OCD pursuant to OCD Rule 116 (Appendix A) or New Mexico Water Quality Control Commission (WQCC) Regulation 1-203 (Appendix B). Appendix C contains the phone numbers and addresses for reporting incidents to the OCD district and Santa Fe offices. Notification will include all information required under the respective rule or regulation. Below is a description of some of the information required:

A. RESPONSIBLE PARTY AND LOCAL CONTACT

The name, address and telephone number of the person/persons in charge of the facility/operation as well as the owner and/or operator of the facility/operation and a local contact.

B. FACILITY

The name and address of the facility or operation where the incident took place and the legal location listed by quarter-quarter, section, township and range, and by distance and direction from the nearest town or prominent landmark so that the exact site location can be readily located on the ground.

C. TIME OF INCIDENT

The date, time and duration of the incident.

D. DISCHARGE EVENT

A description of the source and cause of the incident.

E. TYPE OF DISCHARGE

A description of the nature or type of discharge. If the material leaked, spilled or released is anything other than crude oil, condensate or produced water include its chemical composition and physical characteristics.

F. QUANTITY

The known or estimated volume of the discharge.

G. SITE CHARACTERISTICS

The relevant general conditions prevailing at the site including precipitation, wind conditions, temperature, soil type, distance to nearest residence and population centers and proximity of fresh water wells or watercourse (ie. any river, lake, stream, playa, arroyo, draw, wash, gully or natural or man-made channel through which water flows or has flowed).

H. IMMEDIATE CORRECTIVE ACTIONS

Any initial response actions taken to mitigate immediate threats to fresh waters, public health and the environment.

II. INITIAL RESPONSE ACTIONS

Upon learning of a leak, spill or release of any material which has a reasonable probability to injure or be detrimental to public health, fresh waters, animal or plant life, or property or unreasonably interfere with the public welfare or use of the property, the responsible party (RP) should take the following immediate actions unless the actions could create a safety hazard which would result in a threat to personal or public injury:

A. SOURCE ELIMINATION AND SITE SECURITY

The RP should take the appropriate measures to stop the source of the leak, spill or release and limit access to the site as necessary to reduce the possibility of public exposure.

B. CONTAINMENT

Once the site is secure, the RP should take steps to contain the materials leaked, spilled or released by construction of berms or dikes, the use of absorbent pads or other containment actions to limit the area impacted by the event and prevent potential fresh water contaminants from migrating to watercourses or areas which could pose a threat to public health and safety.

C. SITE STABILIZATION

After containment, the RP should recover any products or wastes which can be physically removed from the surface within the containment area. The disposition of all wastes or products removed from the site must be approved by the OCD.

III. SITE ASSESSMENT

Prior to final closure (Section VIII), soils into which nonrecoverable products or wastes have infiltrated and which have a reasonable probability to injure or be detrimental to public health, fresh waters, animal or plant life, or property or unreasonably interfere with the public welfare or use of the property should be assessed for their potential environmental impacts and remediated according to the procedures contained in the following sections. Assessment results form the basis of any required remediation. Sites will be assessed for severity of contamination and potential environmental and public health threats using a risk based ranking system.

The following characteristics should be determined in order to evaluate a sites potential risks, the need for remedial action and, if necessary, the level of cleanup required at the site:

A. GENERAL SITE CHARACTERISTICS

1. Depth To Ground Water

The operator should determine the depth to ground water at each site. The depth to ground water is defined as

the vertical distance from the lowermost contaminants to the seasonal high water elevation of the ground water. If the exact depth to ground water is unknown, the ground water depth can be estimated using either local water well information, published regional ground water information, data on file with the New Mexico State Engineer Office or the vertical distance from adjacent ground water or surface water.

2. Wellhead Protection Area

The operator should determine the horizontal distance from all water sources including private and domestic water sources. Water sources are defined as wells, springs or other sources of fresh water extraction. Private and domestic water sources are those water sources used by less than five households for domestic or stock purposes.

3. Distance To Nearest Surface Water Body

The operator should determine the horizontal distance to all downgradient surface water bodies. Surface water bodies are defined as perennial rivers, streams, creeks, irrigation canals and ditches, lakes, ponds and playas.

B. SOIL/WASTE CHARACTERISTICS

Soils/wastes within and beneath the area of the leak, spill or release should be evaluated to determine the type and extent of contamination at the site. In order to assess the level of contamination, observations should be made of the soils at the surface and samples of the impacted soils should be taken in the leak, spill or release area. Observations should note whether previous leaks, spills or releases have occurred at the site. Additional samples may be required to completely define the lateral and vertical extent of contamination. Soil samples should be obtained according to the sampling procedures in Sections V.A. and V.B. This may be accomplished using a backhoe, drill rig, hand auger, shovel or other means.

Initial assessment of soil contaminant levels is not required if an operator proposes to determine the final soil contaminant concentrations after a soil removal or remediation pursuant to section VI.A.

Varying degrees of contamination described below may co-exist at an individual site. The following sections describe the degrees of contamination that should be documented during the assessment of the level of soil contamination:

1. Highly Contaminated/Saturated Soils

Highly contaminated/saturated soils are defined as those soils which contain a free liquid phase or exhibit gross staining.

2. Unsaturated Contaminated Soils

Unsaturated contaminated soils are defined as soils which are not highly contaminated/saturated, as described above, but contain benzene, toluene, ethylbenzene and xylenes (BTEX) and total petroleum hydrocarbons (TPH) or other potential fresh water contaminants unique to the leak, spill or release. Action levels and sampling and analytical methods for determining contaminant concentrations are described in detail in Sections IV. and V.

**** **(NOTE: Soils contaminated as a result of spills, leaks or releases of non-exempt wastes must be evaluated for all RCRA Subtitle C hazardous waste characteristics. The above definitions apply only to oilfield contaminated soils which are exempt from federal RCRA Subtitle C hazardous waste provisions and nonexempt oilfield contaminated soils which are characteristically nonhazardous according to RCRA Subtitle C regulations. Any nonexempt contaminated soils which are determined to be characteristically hazardous cannot be remediated using this guidance document and will be referred to the New Mexico Environment Department Hazardous Waste Program.)**

C. GROUND WATER QUALITY

If ground water is encountered during the soil/waste characterization of the impacted soils, a sample should be obtained to assess the incidents potential impact on ground water quality. Ground water samples should be obtained using the sampling procedures in Section V.C. Monitor wells may be required to assess potential impacts on ground water and the extent of ground water contamination, if there is a reasonable probability of ground water contamination based upon the extent and magnitude of soil contamination defined during remedial activities.

IV. SOIL AND WATER REMEDIATION ACTION LEVELS

A. SOILS

The sections below describe the OCD's recommended remediation action levels for soils contaminated with petroleum hydrocarbons. Soils contaminated with substances other than petroleum hydrocarbons may be required to be remediated based upon the nature of the contaminant and it's potential to impact fresh waters, public health and the environment.

1. Highly Contaminated/Saturated Soils

All highly contaminated/saturated soils should be remediated insitu or excavated to the maximum extent practicable. These soils should be remediated using techniques described in Section VI.A to the contaminant specific level listed in Section IV.A.2.b.

2. Unsaturated Contaminated Soils

The general site characteristics obtained during the site assessment (Section III.A.) will be used to determine the appropriate soil remediation action levels using a risk based approach. Soils which are contaminated by petroleum constituents will be scored according to the ranking criteria below to determine their relative threat to public health, fresh waters and the environment.

a. Ranking Criteria

Depth To Ground Water	Ranking Score
<50 feet	20
50 - 99	10
>100	0

Wellhead Protection Area

<1000 feet from a water source,or; <200 feet from private domestic water source	
Yes	20
No	0

Distance To Surface Water Body

<200 horizontal feet	20
200 - 1000 horizontal feet	10
>1000 horizontal feet	0

b. Recommended Remediation Action Level

The total ranking score determines the degree of remediation that may be required at any given site. The total ranking score is the sum of all four individual ranking criteria listed in Section IV.A.2.a. The table below lists the remediation action level that may be required for the appropriate total ranking score.

(NOTE: The OCD retains the right to require remediation to more stringent levels than those proposed below if warranted by site specific conditions (ie. native soil type, location relative to population centers and future use of the site or other appropriate site specific conditions.)

	Total Ranking Score		
	>19	10 - 19	0 - 9
Benzene(ppm)*	10	10	10
BTEX(ppm)*	50	50	50
TPH(ppm)**	100	1000	5000

* A field soil vapor headspace measurement (Section V.B.1) of 100 ppm may be substituted for a laboratory analysis of the Benzene and BTEX concentration limits.

** The contaminant concentration for TPH is the concentration above background levels.

B. GROUND WATER

Contaminated ground water is defined as ground water of a present or foreseeable beneficial use which contains free phase products, dissolved phase volatile organic constituents or other dissolved constituents in excess of the natural background water quality. Ground water contaminated in excess of the WQCC ground water standards or natural background water quality will require remediation.

V. SOIL AND WATER SAMPLING PROCEDURES

Below are the sampling procedures for soil and ground water contaminant investigations of leaks, spills or releases of RCRA Subtitle C exempt oil field petroleum hydrocarbon wastes. Leaks, spills or releases of non-exempt RCRA wastes must be tested to demonstrate that the wastes are not characteristically hazardous according to RCRA regulations. Sampling for additional

constituents may be required based upon the nature of the contaminant which was leaked, spilled or released.

A. HIGHLY CONTAMINATED OR SATURATED SOILS

The following method is used to determine if soils are highly contaminated or saturated:

1. Physical Observations

Study a representative sample of the soil for observable free petroleum hydrocarbons or immiscible phases and gross staining. The immiscible phase may range from a free hydrocarbon to a sheen on any associated aqueous phase. A soil exhibiting any of these characteristics is considered highly contaminated or saturated.

B. UNSATURATED CONTAMINATED SOILS

The following methods may be used for determining the magnitude of contamination in unsaturated soils:

1. Soil Sampling Procedures for Headspace Analysis

A headspace analysis may be used to determine the total volatile organic vapor concentrations in soils (ie. in lieu of a laboratory analysis for benzene and BTEX but not in lieu of a TPH analysis). Headspace analysis procedures should be conducted according to OCD approved industry standards or other OCD-approved procedures. Accepted OCD procedures are as follows:

a) Fill a 0.5 liter or larger jar half full of sample and seal the top tightly with aluminum foil or fill a one quart zip-lock bag one-half full of sample and seal the top of the bag leaving the remainder of the bag filled with air.

b) Ensure that the sample temperature is between 15 to 25 degrees Celsius (59-77 degrees Fahrenheit).

c) Allow aromatic hydrocarbon vapors to develop within the headspace of the sample jar or bag for 5 to 10 minutes. During this period, the sample jar should be shaken vigorously for 1 minute or the contents of the bag should be gently massaged to break up soil clods.

d) If using a jar, pierce the aluminum foil seal with the probe of either a PID or FID organic vapor meter (OVM), and then record the highest (peak) measurement. If using a bag, carefully open one end of the bag and insert the probe of the OVM into the bag and re-seal the bag around the probe as much as possible to prevent vapors from escaping. Record the peak measurement. The OVM must be calibrated to assume a benzene response factor.

2. **Soil Sampling Procedures For Laboratory Analysis**

a. Sampling Procedures

Soil sampling for laboratory analysis should be conducted according to OCD approved industry standards or other OCD-approved procedures. Accepted OCD soil sampling procedures and laboratory analytical methods are as follows:

i) Collect samples in clean, air-tight glass jars supplied by the laboratory which will conduct the analysis or from a reliable laboratory equipment supplier.

ii) Label the samples with a unique code for each sample.

iii) Cool and store samples with cold packs or on ice.

iv) Promptly ship sample to the lab for analysis following chain of custody procedures.

v) All samples must be analyzed within the holding times for the laboratory analytical method specified by EPA.

b. Analytical Methods

All soil samples must be analyzed using EPA methods, or by other OCD approved methods and must be analyzed within the holding time specified by the method. Below are laboratory analytical methods commonly accepted by OCD for analysis of soil samples analyzed for petroleum related constituents. Additional analyses may be required if the substance leaked, spilled or released has been anything other than petroleum based fluids or wastes.

i) Benzene, toluene, ethylbenzene and xylene

- EPA Method 602/8020

ii) Total Petroleum Hydrocarbons

- EPA Method 418.1, or;
- EPA Method Modified 8015

C. GROUND WATER SAMPLING

If an investigation of ground water quality is deemed necessary, it should be conducted according to OCD approved industry standards or other OCD-approved procedures. The following methods are standard OCD accepted methods which

should be used to sample and analyze ground water at RCRA Subtitle C exempt sites (Note: The installation of monitor wells may not be required if the OCD approves of an alternate ground water investigation or sampling technique):

1. Monitor Well Installation/Location

One monitor well should be installed adjacent to and hydrologically down-gradient from the area of the leak, spill or release to determine if protectable fresh water has been impacted by the disposal activities. Additional monitor wells, located up-gradient and down-gradient of the leak, spill or release, may be required to delineate the full extent of ground water contamination if ground water underlying the leak, spill or release has been found to be contaminated.

2. Monitor Well Construction

a) Monitor well construction materials should be:

i) selected according to industry standards;

ii) chemically resistant to the contaminants to be monitored; and

iii) installed without the use of glues/adhesives.

b) Monitor wells should be constructed according to OCD approved industry standards to prevent migration of contaminants along the well casing. Monitor wells should be constructed with a minimum of fifteen (15) feet of well screen. At least five (5) feet of the well screen should be above the water table to accommodate seasonal fluctuations in the static water table.

3. Monitor Well Development

When ground water is collected for analysis from monitoring wells, the wells should be developed prior to sampling. The objective of monitor well development is to repair damage done to the formation by the drilling operation so that the natural hydraulic properties of the formation are restored and to remove any fluids introduced into the formation that could compromise the integrity of the sample. Monitoring well development is accomplished by purging fluid from the well until the pH and specific conductivity have stabilized and turbidity has been reduced to the greatest extent possible.

4. Sampling Procedures

Ground water should be sampled according to OCD accepted standards or other OCD approved methods. Samples should be collected in clean containers supplied by the laboratory which will conduct the analysis or from a reliable laboratory equipment supplier. Samples for

different analyses require specific types of containers. The laboratory can provide information on the types of containers and preservatives required for sample collection. The following procedures are accepted by OCD as standard sampling procedures:

a) Monitor wells should be purged of a minimum of three well volumes of ground water using a clean bailer prior to sampling to ensure that the sample represents the quality of the ground water in the formation and not stagnant water in the well bore.

b) Collect samples in appropriate sample containers containing the appropriate preservative for the analysis required. No bubbles or headspace should remain in the sample container.

c) Label the sample containers with a unique code for each sample.

d) Cool and store samples with cold packs or on ice.

e) Promptly ship sample to the lab for analysis following chain of custody procedures.

f) All samples must be analyzed within the holding times for the laboratory analytical method specified by EPA.

5. Ground Water Laboratory Analysis

Samples should be analyzed for potential ground water contaminants contained in the waste stream, as defined by the WQCC Regulations. All ground water samples must be analyzed using EPA methods, or by other OCD approved methods and must be analyzed within the holding time specified by the method. Below are OCD accepted laboratory analytical methods for analysis of ground water samples analyzed for petroleum related constituents. Additional analyses may be required if the substance leaked, spilled or release has been anything other than a petroleum based fluid or waste.

a. <u>Analytical Methods</u>

i.) Benzene, Toluene, Ethylbenzene and Xylene

- EPA Method 602/8020

ii.) Major Cations and Anions

- Various EPA or standard methods

iii.) Heavy Metals

- EPA Method 6010, or;
- Various EPA 7000 series methods

iv.) Polynuclear Aromatic Hydrocarbons

- EPA Method 8100

VI. REMEDIATION

The following discussion summarizes recommended techniques for remediation of contaminated soil and ground water as defined in Section IV.A. and IV.B. OCD approval for remediation of an individual leak, spill or release site is not required if the company is operating under an OCD approved spill containment plan. All procedures which deviate from the companies spill containment plan must be approved by OCD.

A. SOIL REMEDIATION

When RCRA Subtitle C exempt or RCRA nonhazardous petroleum contaminated soil requires remediation, it should be remediated and managed according to the criteria described below or by other OCD approved procedures which will remove, treat, or isolate contaminants in order to protect fresh waters, public health and the environment.

In lieu of remediation, OCD may accept an assessment of risk which demonstrates that the remaining contaminants will not pose a threat to present or foreseeable beneficial use of fresh waters, public health and the environment.

1. Contaminated Soils

Highly contaminated/saturated soils and unsaturated contaminated soils exceeding the standards described in Section IV.A. should be either:

a) Excavated from the ground until a representative sample from the walls and bottom of the excavation is below the contaminant specific remediation level listed in Section IV.A.2.b or an alternate approved remediation level, or;

b) Excavated to the maximum depth and horizontal extent practicable. Upon reaching this limit a sample should be taken from the walls and bottom of the excavation to determine the remaining levels of soil contaminants, or;

c) Treated in place, as described in Section VI.A.2.b.ii. - Treatment of Soil in Place, until a representative sample is below the contaminant specific remediation level listed in Section IV.A.2.b, or an alternate approved remediation level, or;

d) Managed according to an approved alternate method.

2. Soil Management Options

All soil management options must be approved by OCD. The following is a list of options for either on-site treatment or off-site treatment and/or disposal of contaminated soils:

a. Disposal

Excavated soils may be disposed of at an off-site OCD approved or permitted facility.

b. Soil Treatment and Remediation Techniques

i. Landfarming

Onetime applications of contaminated soils may be landfarmed on location by spreading the soil in an approximately six inch lift within a bermed area. Only soils which do not contain free liquids can be landfarmed. The soils should be disced regularly to enhance biodegradation of the contaminants. If necessary, upon approval by OCD, moisture and nutrients may be added to the soil to enhance aerobic biodegradation.

In some high risk areas an impermeable liner may be required to prevent leaching of contaminants into the underlying soil.

Landfarming sites that will receive soils from more than one location are considered centralized sites and must be approved separately by the OCD prior to operation.

ii. Insitu Soil Treatment

Insitu treatment may be accomplished using vapor venting, bioremediation or other approved treatment systems.

iii. Alternate Methods

The OCD encourages alternate methods of soil remediation including, but not limited to, active soil aeration, composting, bioremediation, solidification, and thermal treatment.

B. GROUND WATER REMEDIATION

1. Remediation Requirements

Ground water remediation activities will be reviewed and approved by OCD on a case by case basis prior to commencement of remedial activities. When contaminated

ground water exceeds WQCC ground water standards, it should be remediated according to the criteria described below.

a. Free Phase Contamination

Free phase floating product should be removed from ground water through the use of skimming devices, total-fluid type pumps, or other OCD-approved methods.

b. Dissolved Phase Contamination

Ground water contaminated with dissolved phase constituents in excess of WQCC ground water standards can be remediated by either removing and treating the ground water, or treating the ground water in place. If treated waters are to be disposed of onto or below the ground surface, a discharge plan must be submitted and approved by OCD.

c. Alternate Methods

The OCD encourages other methods of ground water remediation including, but not limited to, air sparging and bioremediation. Use of alternate methods must be approved by OCD prior to implementation.

VII. TERMINATION OF REMEDIAL ACTION

Remedial action may be terminated when the criteria described below have been met:

A. SOIL

Contaminated soils requiring remediation should be remediated so that residual contaminant concentrations are below the recommended soil remediation action level for a particular site as specified in Section IV.A.2.b.

If soil action levels cannot practicably be attained, an evaluation of risk may be performed and provided to OCD for approval showing that the remaining contaminants will not pose a threat to present or foreseeable beneficial use of fresh water, public health and the environment.

B. GROUND WATER

A ground water remedial action may be terminated if all recoverable free phase product has been removed, and the concentration of the remaining dissolved phase contaminants in the ground water does not exceed New Mexico WQCC water quality standards or background levels. Termination of remedial action will be approved by OCD upon a demonstration of completion of remediation as described in above.

VIII. FINAL CLOSURE

Upon termination of any required remedial actions (Section VII.) the area of a leak, spill or release may be closed by backfilling any excavated areas, contouring to provide drainage away from the site, revegetating the area or other OCD approved methods.

IX. FINAL REPORT

Upon completion of remedial activities a final report summarizing all actions taken to mitigate environmental damage related to the leak, spill or release will be provided to OCD for approval.

APPENDIX A

1-203. NOTIFICATION OF DISCHARGE--REMOVAL.

A. With respect to any discharge from any facility of oil or other water contaminant, in such quantity as may with reasonable probability injure or be detrimental to human health, animal or plant life, or property, or unreasonably interfere with the public welfare or the use of property, the following notifications and corrective actions are required:

1. As soon as possible after learning of such a discharge, but in no event more than twenty-four (24) hours thereafter, any person in charge of the facility shall orally notify the Chief, Ground Water Bureau, Environmental Improvement Division, or his counterpart in any constituent agency delegated responsibility for enforcement of these rules as to any facility subject to such delegation. To the best of that person's knowledge, the following items of information shall be provided:

a. the name, address, and telephone number of the person or persons in charge of the facility, as well as of the owner and/or operator of the facility;

b. the name and address of the facility;

c. the date, time, location, and duration of the discharge;

d. the source and cause of discharge;

e. a description of the discharge, including its chemical composition;

f. the estimated volume of the discharge; and

g. any actions taken to mitigate immediate damage from the discharge.

2. When in doubt as to which agency to notify, the person in charge of the facility shall notify the Chief, Ground Water Bureau, Environmental Improvement Division. If that division does not have authority pursuant to Commission delegation, the division shall notify the appropriate constituent agency.

3. Within one week after the discharger has learned of the discharge, the facility owner and/or operator shall send written notification to the same division official, verifying the prior oral notification as to each of the foregoing items and providing any appropriate additions or corrections to the information contained in the prior oral notification.

4. The oral and written notification and reporting requirements contained in the three preceding paragraphs and the paragraphs below are not intended to be duplicative of discharge notification and reporting requirements promulgated by the Oil Conservation Commission (OCC) or by the Oil Conservation Division (OCD); therefore, any facility which is subject to OCC or OCD discharge notification and reporting requirements need not additionally comply with the nofification/and reporting requirements herein.

5. As soon as possible after learning of such a discharge, the owner/operator of the facility shall take such corrective actions as are necessary or appropriate to contain and remove or mitigate the damage caused by the discharge.

A. The Division shall be notified of any fire, break, leak, spill, or blowout occurring at any injection or disposal facility or at any oil or gas drilling, producing, transporting, or processing facility in the State of New Mexico by the person operating or controlling such facility.

B. "Facility," for the purpose of this rule, shall include any oil or gas well, any injection or disposal well, and any drilling or workover well; any pipe line through which crude oil, condensate, casinghead or natural gas, or injection or disposal fluid (gaseous or liquid) is gathered, piped, or transported (including field flow-lines and lead-lines but not including natural gas distribution systems); any receiving tank, holding tank, or storage tank, or receiving and storing receptacle into which crude oil, condensate, injection or disposal fluid, or casinghead or natural gas is produced, received, or stored; any injection or disposal pumping or compression station including related equipment; any processing or refining plant in which crude oil, condensate, or casinghead or natural gas is processed or refined; and any tank or drilling pit or slush pit associated with oil or gas well or injection or disposal well drilling operations or any tank, storage pit, or pond associated with oil or gas production or processing operations or with injection or disposal operations and containing hydrocarbons or hydrocarbon waste or residue, salt water, strong caustics or strong acids, or other deleterious chemicals or harmful contaminants.

C. Notification of such fire, break, leak, spill, or blowout shall be in accordance with the provisions set forth below:

(1) Well Blowouts. Notification of well blowouts and/or fires shall be "immediate notification" described below. ("Well blowout" is defined as being loss of control over and subsequent eruption of any drilling or workover well, or the rupture of the casing, casinghead, or wellhead or any oil or gas well or injection or disposal well, whether active or inactive, accompanied by the sudden emission of fluids, gaseous or liquid, from the well.)

(2) "Major" Breaks, Spills, or Leaks. Notification of breaks, spills, or leaks of 25 or more barrels of crude oil or condensate, or 100 barrels or more of salt water, none of which reaches a watercourse or enters a stream or lake; breaks, spills, or leaks in which one or more barrels of crude oil or condensate or 25 barrels or more of salt water does reach a watercourse or enters a stream or lake; and breaks, spills, or leaks of hydrocarbons or hydrocarbon waste or residue, salt water, strong caustics or strong acids, gases, or other deleterious chemicals or harmful contaminants of any magnitude which may with reasonable probability endanger human health or result in substantial damage to property, shall be "immediate notification" described below.

(3) "Minor" Breaks, Spills, or Leaks. Notification of breaks, spills, or leaks of 5 barrels or more but less than 25 barrels of crude oil or condensate, or 25 barrels or more but less than 100 barrels of salt water, none of which reaches a watercourse or enters a stream or lake, shall be "subsequent notification" described below.

(4) "Gas Leaks and Gas Line Breaks. Notification of gas leaks from any source or of gas pipe line breaks in which natural or casinghead gas of any quantity has escaped or is escaping which may with reasonable probability endanger human health or result in substantial damage to property shall be "immediate notification" described below. Notification of gas pipe line breaks or leaks in which the loss is estimated to be 1000 or more MCF of natural or casinghead gas but in which there is no danger to human health nor of substantial damage to property shall be "subsequent notification" described below.

(5) Tank Fires. Notification of fires in tanks or other receptacles caused by lightning or any other cause, if the loss is, or it appears that the loss will be, 25 or more barrels of crude oil or condensate, or fires which may with reasonable probability endanger human health or result in substantial damage to property, shall be "immediate notification" as described below. If the loss is, or it appears that the loss will be at least 5 barrels but less than 25 barrels, notification shall be "subsequent notification" described below.

(6) Drilling Pits, Slush Pits, and Storage Pits and Ponds. Notification of breaks and spills from any drilling pit, slush pit, or storage pit or pond in which any hydrocarbon or hydrocarbon waste or residue, strong caustic or strong acid, or other deleterious chemical or harmful contaminant endangers human health or does substantial surface damage, or reaches a watercourse or enters a stream or lake in such quantity

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. _____ dated 6/8/10

or cash received on _____ in the amount of $ 100.00

from Transwestern Pipeline

for GW-52

Submitted by: Lawrence Romero Date: 6/16/10

Submitted to ASD by: Lawrence Romero Date: 6/16/10

Received in ASD by: _____ Date: _____

Filing Fee ✓ New Facility _____ Renewal _____

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2010

To be deposited in the Water Quality Management Fund.

Full Payment _____ or Annual Increment _____

TRANSWESTERN PIPELINE CO LLC
800 E. SONTERRA BLVD., SUITE 400
SAN ANTONIO, TX 78258-3941

Payment Date: **06/08/2010**

Check No.: **541014383**
Check Date: **06/08/2010**

Vendor: NEW MEXICO ENERGY MINERALS AND
Vendor ID: 4000001384

Invoice Number	Invoice Date	Document Number	Reference	Gross Amount	Discount	Net Amount
			The items listed below are managed on the following account: STATE OF NEW MEXICO ENVIRONMENT DEP 2905 RODEO PARK DRIVE EAST SANTE FE GW-52			
GW052	05/18/2010	3100032817	Overnight to Larry Campbe	100.00	0.00	100.00
			Check Total.....			**$ 100.00**

DETACH AND RETAIN THIS STATEMENT. The Attached Check Is In Payment of Items Described Above. If not Correct Please Notify Us Promptly. No Receipt Desired.

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

December 21, 2005

Mr. Larry Campbell
Transwestern Pipeline Company
6381 North Main
Roswell, NM 88201

RE: Discharge Plan Renewal GW-052
Transwestern Pipeline Company
Roswell Compressor Station
Chaves County, New Mexico

Dear Mr. Campbell

The ground water discharge plan renewal application GW-052 for the Transwestern Pipeline Company Roswell Compressor Station located in the SW/4 SW/4 of Section 21, Township 9 South, Range 24 East, NMPM, Chaves County, New Mexico, is hereby approved under the conditions contained in the enclosed attachment. Enclosed are two copies of the conditions of approval. Please sign and return one copy to the New Mexico Oil Conservation Division (OCD) Santa Fe office within 10 working days of receipt of this letter.

The original discharge plan application was submitted on April 9, 1990 and approved November 9, 1990. The discharge plan renewal application letter, dated July 18, 2005, submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations also includes all earlier applications and all conditions later placed on those approvals. The discharge plan is renewed pursuant to Section 3109.C. Please note Section 3109.G, which provides for possible future amendment of the plan. Please be advised that approval of this plan does not relieve Transwestern Pipeline Company of responsibility should operations result in pollution of surface water, ground water or the environment. Nor does it relieve Transwestern Pipeline Company of its responsibility to comply with any other governmental authority's rules and regulations.

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

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

Pursuant to Section 3109.H.4, this renewal plan is for a period of five years. This renewal will expire on November 9, 2010 and Transwestern Pipeline Company should submit an application in ample time before this date. Note that under Section 3106.F of the regulations, if a discharger submits a discharge plan renewal application at least 120 days before the discharge plan expires and is in compliance with the approved plan, then the existing discharge plan will not expire until the application for renewal has been approved or disapproved. It should be noted that all discharge plan facilities will be required to submit the results of an underground drainage testing program as a requirement for discharge plan.

The discharge plan renewal application for the Transwestern Pipeline Company Roswell Compressor Station is subject to WQCC Regulation 3114. Every facility submitting a discharge plan application will be assessed a filing fee of $100. There is a renewal flat fee assessed for gas compressor station facilities with horsepower rating greater than 1,000 horsepower of $1,700.

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

Sincerely,

Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division

Attachment

Copy: OCD Artesia Office

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-052
TRANSWESTERN PIPELINE COMPANY
ROSWELL COMPRESSOR STATION
DISCHARGE PLAN APPROVAL CONDITIONS
December 21, 2005

1. Payment of Discharge Plan Fees: The $100.00 filing fee has not been received by the OCD. There is a required permit fee for renewal of $1,700. The filing fee and the permit are due upon receipt of this approval. All checks are to be made payable to Water Quality Management Fund and forwarded to the OCD Santa Fe Office.

2. Commitments: Transwestern Pipeline Company will abide by all commitments submitted in the discharge plan renewal application letter dated July 18, 2005 and these conditions for approval.

3. Waste Disposal: All wastes will be disposed of at an OCD-approved facility. Only oilfield exempt wastes shall be disposed of down Class II injection wells. Non-exempt oilfield wastes that are non-hazardous may be disposed of at an OCD approved facility upon proper waste determination per 40 CFR Part 261. Any waste stream that is not listed in the discharge plan will be approved by OCD on a case-by-case basis.

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

5. Process Areas: All process and maintenance areas which show evidence that leaks and spills are reaching the ground surface must be either paved and curbed or have some type of spill collection device incorporated into the design.

6. Above-Ground Tanks: All above-ground tanks which contain fluids other than fresh water must be bermed to contain a volume of one-third more than the total volume of the largest tank or of all interconnected tanks. All new tanks or existing tanks that undergo a major modification, as determined by the Division, must be placed within an impermeable bermed enclosure.

7. Above-Ground Saddle Tanks: Above-ground saddle tanks must have impermeable pad and curb type containment unless they contain fresh water or fluids that are gases at atmospheric temperature and pressure.

8. Labeling: All tanks, drums and containers will be clearly labeled to identify their contents and other emergency notification information.

9. Below-Grade Tanks/Sumps: All-below grade tanks, sumps, and pits must be approved by the OCD prior to installation or upon modification and must incorporate secondary containment and leak-detection into the design. All sumps and below-grade tanks must demonstrate integrity annually. Operators may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure and/or visual inspection of cleaned out tanks and/or sumps, or other OCD-approved methods. The OCD will be notified at least 72 hours prior to all testing.

10. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity every five (5) years. Operators may propose various methods for testing such as pressure testing to 3 pounds per square inch above normal operating pressure or other means acceptable to the OCD. The OCD will be notified at least 72 hours prior to all testing.

11. Class V Wells: No Class V wells that inject non-hazardous industrial wastes or a mixture of industrial wastes and domestic wastes will be closed unless it can be demonstrated that groundwater will not be impacted in the reasonably foreseeable future. Leach fields and other wastewater disposal systems at OCD-regulated facilities that inject non-hazardous fluid into or above an underground source of drinking water are considered Class V injection wells under the EPA UIC program. Class V wells that inject domestic waste only must be permitted by the New Mexico Environment Department.

12. Housekeeping: All systems designed for spill collection/prevention will be inspected weekly and after each storm event to ensure proper operation and to prevent overtopping or system failure. A record of inspections will be retained on site for a period of five years.

13. Spill Reporting: All spills/releases will be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Artesia District Office.

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

15. Storm Water Plan: The facility will have an approved storm water run-off plan.

16. Vadose Zone and Water Pollution
The previously submitted investigation and remediation plans were submitted pursuant to the discharge permit and all future discoveries of contamination will be addressed through the discharge permit process.

17. Closure: The OCD will be notified when operations of the Roswell Compressor Station are discontinued for a period in excess of six months. Prior to closure of the Roswell Compressor Station, the operator will submit a closure plan for approval. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

18. Conditions accepted by: Transwestern Pipeline Company, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Transwestern Pipeline Company further acknowledges that the Division for good cause shown as necessary to protect fresh water, human health and the environment may change these conditions and requirements of this permit administratively.

Transwestern Pipeline Company

Print Name: Don Hawkins

Signature: Don Hawkins

Title: Vice President - Operations

Date: 1/16/06

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

December 21, 2005

Mr. Larry Campbell
Transwestern Pipeline Company
6381 North Main
Roswell, NM 88201

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Transwestern Pipeline Company
Roswell Compressor Station
Chaves County, New Mexico

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

Sincerely,

Roger C. Anderson
Chief, Environmental Bureau
Oil Conservation Division

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TRANSWESTERN PIPELINE COMPANY
ROSWELL COMPRESSOR STATION
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December 21, 2005

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Transwestern Pipeline Company

Print Name: _____

Signature: _____

Title: _____

Date: _____

Martin, Ed

From: Price, Wayne
Sent: Friday, October 27, 2000 8:31 AM
To: Martin, Ed; Williams, Donna
Subject: DP Condition

Vadose Zone and Water Pollution:

The previously submitted investigation and remediation plans were submitted pursuant to the discharge plan and all future discoveries of contamination will be addressed through the discharge plan process.

This morning meeting is a part of the DP to cover ongoing remediation.

GW-052

March 14, 1996

MEMORANDUM

TO: Jennifer Salisbury, Bill LeMay, Lyn Hebert, Rand Carroll and Roger Anderson

FROM: Carol Leach

SUBJECT: Transwestern and ED

Tuesday I received a call from Lou Soldano, an attorney for Transwestern (TW). He told me about the meeting TW had with ED. He was concerned because Secretary Weidler seemed to think that OCD only had authority to clean up hydrocarbons. My recollection was that at our meeting with ED, Mark specifically asked Roger about this and asked about the standard for the specific solvent in question and was told we clean up everything at the site to the WQCC standard, or a more stringent one.

Anyway, the meeting was confusing to Lou because ED still wants a closure plan from TW as indicated in the attached letter. Lou was not sure if the plan was to meet all RCRA requirements or not. In Lou's view, most of he meeting was devoted to ED scolding TW.

Roger says his recent conversations with Benito also indicate some differing understandings about how we are to proceed. Benito indicates that they will review our workplan for TW, but will also proceed on their own track.

I had really thought we were making some progress, but it does not appear to be the case. I have several calls into ED's attorney, but have not reached her.

We may need a meeting for additional clarification.

State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502-0110
Telephone (505) 827-2855
Fax (505) 827-2836

GARY E. JOHNSON
GOVERNOR

MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON
DEPUTY SECRETARY

Mr. J. A. Hulscher
Vice President Operations
Transwestern Pipeline Co.
Summitt Office Bldg., Ste. 250
4001 Indian School Rd., NE
Albuquerque, NM 87110

Dear Joe:

We appreciate that you and various staff came to our office to visit about the jurisdictional issues and the contaminant problems at the No. 9 Station north of Roswell.

As mentioned we cannot abrogate our statutory responsibilities. However, we want to minimize duplication of efforts that can result from response to two agencies. We trust that the briefing I gave will help you understand these matters from our perspective. TPL needs to move forward with the Closure Plan submitted over a year ago and amended and annotated by our staff; or, submit an alternate plan that is acceptable to us and adequately addresses the RCRA waste(s) at the site.

We look forward to your response.

Sincerely,

Mark E. Weidler
Secretary

CC: Benito Garcia, Chief, HRMB
Susan McMichael

State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502

GARY E. JOHNSON
GOVERNOR

OFFICE OF GENERAL COUNSEL
PHONE 505-827-2990
FAX 505-827-1628

MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

December 21, 1995

Mr. Richard Virtue, Esq.
Taichert, Wiggins, Virtue & Najjar
119 East Marcy Street, Suite 100
P.O. Box 4265
Santa Fe, New Mexico 87502-4265

Re: Transwestern Pipeline Company (TPC)

Dear Mr. Virtue:

This letter responds to the position of Transwestern Pipeline Company (TPC) that the New Mexico Environment Department (NMED) is not the proper regulatory authority for closure of the surface impoundments at the Roswell Compressor Station. We have carefully considered your position and have concluded that at this time closure is required pursuant to the New Mexico Hazardous Waste Act (HWA). Further, as discussed below, we do not believe that closure under the authority of the New Mexico Oil Conservation Division (OCD) will achieve the same remediation goals or adequately protect human health and the environment.

As you are aware, TPC submitted three RCRA closure plans for the surface impoundments in question which NMED staff concluded were either incomplete or inaccurate. (see attached letters from NMED regarding Notices of Deficiencies). Based upon the available information, we must conclude that hazardous wastes were disposed of at the facility during the time period in question (including 100% 1,1,1 TCA) and that proper closure can only be accomplished pursuant to the HWA's requirements. Further, there is substantial ground water contamination at this site. Solvents have been detected at 22,400 times the New Mexico Water Quality Control Commission (WQCC) standard for 1,1 DCA and three times the WQCC standard for 1,1,1 TCA.

As a technical, legal or practical matter, we do not agree that cleanup under OCD standards would be equally protective of human health and the environment. TPC's position appears to be premised upon an assumption that no hazardous wastes or constituents were

disposed of at the surface impoundments in question. As stated, the facts of this site do not support this conclusion. Contrary to your position, there are significant differences between the cleanup criteria and goals under OCD and NMED. For example, cleanup required by NMED under the HWA involves health based standards and other media not addressed by OCD. Further, OCD does not oversee solvent plume characterization and cleanup of hazardous waste sites or other RCRA concerns.

This letter will confirm that NMED intends to issue the modified closure plan for public comment no later than January 31, 1996. If you have any additional information which supports the position of TPC, we would appreciate receiving it as soon as possible and prior to January 31, 1996. Specifically, we request any information such as manifests or other documentation which demonstrate that no hazardous wastes were disposed of at this facility. Further, we would appreciate any area photos of the surface impoundments taken during the time period in question.

If we do not receive any further information from TPC, we will proceed with public comment to avoid any further delay with cleanup at this site. We are confident that proper cleanup may be achieved through the regulatory oversight of NMED with, as necessary, the coordination of OCD. If you have any questions, do not hesitate to call.

Sincerely,

Susan M. McMichael

SUSAN M. McMICHAEL
Assistant General Counsel

Enclosure(s)

cc: Ed Kelley
Benito Garcia
Barbara Hoditscheck
Ron Kern
Bill Kendrick
Rodger Anderson
David Neleigh, EPA Region 6 (PD-N)

State of New Mexico
ENVIRONMENT DEPARTMENT
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, New Mexico 87502
OFFICE OF GENERAL COUNSEL
PHONE: 505-827-2990
FAX: 505-827-1628

GARY E. JOHNSON
GOVERNOR

MARK E. WEIDLER
SECRETARY

EDGAR T. THORNTON, III
DEPUTY SECRETARY

August 9, 1996

Joe Hulscher, Vice President
Transwestern Pipeline Company
4001 Indian School Rd. N.E.
Albuquerque, New Mexico 87110

RE: PROPOSED SETTLEMENT AGREEMENT AND ALTERNATE CLOSURE PLAN

Dear Mr. Hulscher:

This letter is in response to your letter and proposed settlement agreement date June 28, 1996. Following our March meeting, I requested in writing that Transwestern Pipeline Company (TPC) submit the technical closure plan which our staff had approved or an acceptable alternate to that closure plan as required by law. Upon request from TPC, I provided TPC with an extension to submit entitled "Settlement Agreement and Alternative Closure Plan." We cannot recall any discussion authorizing TPC to undertake the drafting of a "settlement agreement." Further, we do not believe the Texas Risk Reduction Standard referred to in the proposal is appropriate under the circumstances.

Nevertheless, our staff has reviewed your proposal and regrettably, has concluded that it is completely unacceptable and not in compliance with the regulatory requirements under either the New Mexico Hazardous Waste Act (HWA) or the Resource Conservation and Recovery Act (RCRA). We fully expected a technical closure plan substantially similar to the plan which NMED approved pursuant to the HWA. To the extent that TPC has chosen to apply for approval of closure and remediation with the Oil Conservation Division (OCD), we would like to clarify that OCD has neither authority nor jurisdiction to approve closure or cleanup of hazardous waste disposal sites. Our conclusion that TPC must close and remediate under the HWA and RCRA is based upon our environmental expertise and fully supported by the United States Environmental Protection Agency (see attached letter).

For these reasons, we would hope that TPC determines to avoid unnecessary future delay and costs by coming into compliance with the law as soon as possible. We hereby request that TPC resubmit the previously developed closure plan that was proposed for

approval and public comment which was withdrawn by TPC on January 19, 1996. This letter also serves to notify TPC that it may be liable for civil penalties under the HWA and RCRA for each day that it determines to fail to comply with the requirements to submit a closure plan. If we do not receive the submittal of the previously withdrawn closure plan prior to September 3, 1996, we will take appropriate actions.

If you wish to discuss this matter in more detail, please contact either me or Ed Kelley to arrange a meeting. We look forward to hearing from you.

Sincerely,

MARK E. WEIDLER

cc: Robert E. Hannesschlager, USEPA
Jennifer Salisbury, Secretary, Energy & Minerals
Richard Virtue, Esq.
Lou Soldano, Esq.
Bill Kendrick, Enron Operations Corp.
Ed Kelley, NMED
Benito Garcia, NMED
Susan McMichael, OGC NMED

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

JUN 19 1996

Mr. Ed Kelley, Director
Water and Waste Management Division
New Mexico Environment Department
P.O. Box 26110
Santa Fe, NM 87502

Dear Mr. Kelley:

As discussed in the April meeting between Mark Weidler and Allyn M. Davis, the Environmental Protection Agency (EPA) has reviewed the circumstances concerning Transwestern Pipeline Company's (TPC) allegation that it does not need to comply with the requirements for closure or permitting under the Resource Conservation and Recovery Act (RCRA).

The EPA fully supports the position of the New Mexico Environment Department (NMED) and its analysis that RCRA is applicable to TPC. This decision is based on our review of the situation and a letter dated February 1, 1996, from NMED's Susan McMichael to Richard Virtue of TPC's legal counsel, which addresses each of TPC's assertions. Also, I have enclosed some guidance from the RCRA permit compendium pertaining to the petroleum waste exclusion.

Please keep us informed of the regulatory status in this matter. If you have any further questions, do not hesitate to call Mr. David Neleigh at (214) 665-6785.

Sincerely yours,

Robert E. Hannesschlager, P.E.
Acting Division Director
Multimedia Planning
and Permitting Division

Enclosure