

GW - 83

DP Cancelled via RBDMS

**GENERAL
CORRESPONDENCE**

YEAR(S):

1996-1997

OIL CONSERVATION DIVISION
RECEIVED

'96 APR 25 AM 8 52

Unocal Oil & Gas Division
Unocal Corporation
P.O. Box 760
Moab, Utah 84532
Telephone (801) 686-2238

RECEIVED

APR 26 1996

Environmental Bureau
Oil Conservation Division

UNOCAL 

State of New Mexico
New Mexico Oil Conservation Division
Attn: Pat Sanchez
NMED - Water Quality Management
2040 South Pacheco Street
Santa Fe, New Mexico 87505

April 22, 1996

RE: NMOCD Approved Discharge Plans for compressor sites that never were constructed

Approval for two Compressor stations, GW-81 and GV-83 was given to Unocal by NMOCD on October 11, 1991. Both of these compressor stations were never constructed.

At this time Unocal does not foresee the construction of either one of these compressor sites. Tracking and monitoring these sites for NMOCD and filing renewals by Unocal is not productive, so Unocal is requesting that discharge plan permits for GW-81 and GW-83 be withdrawn from the NMOCD files in Santa Fe and Aztec.

If you require further information to accomplish this task, please call me at 801-686-7604 or contact me at the letterhead address.

Thank you.

Sincerely,



Union Oil Company of California, dba Unocal
Mike Tabet
Staff HES Coordinator

cc: Brett Ligget
Bob Caine
Randy Koliba
Denny Foust

MEMORANDUM OF MEETING OR CONVERSATION

<input checked="" type="checkbox"/> Telephone <input type="checkbox"/> Personal	Time 9:00 AM	Date 4-18-96
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<u>Originating Party</u>	<u>Other Parties</u>
Pat Sanchez - NMOC	Mike Tabet - UNOCAL

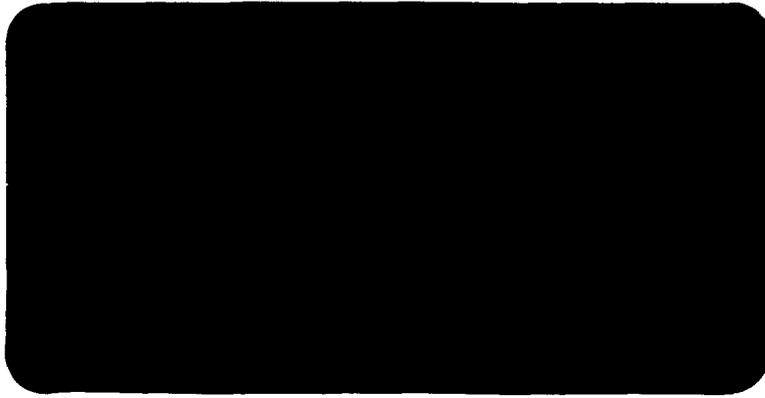
Subject Unocal D.P.'S for GW-81 & GW-83.

Discussion These facilities according to Mr. Mike Tabet w/ Unocal were never built.

[Faint handwritten notes in the center of the page, possibly "Unocal" and "GW-81"]

Conclusions or Agreements
NMOC to cancel Discharge Plan permits No. GW-81 and GW-83- As they were never built.

Distribution File (GW-81, GW-83) Signed *Patrick W. [Signature]*



GCL

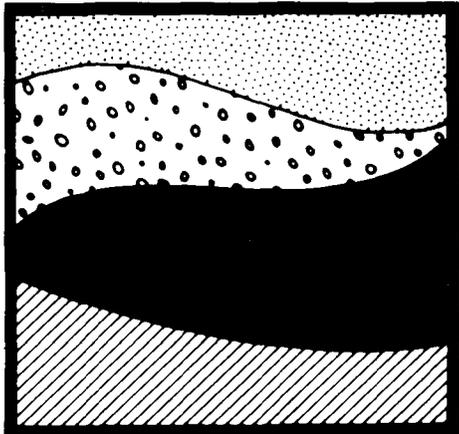


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- 1 Compressor Station Number 4
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Unocal Corporation
Compressor Station Number 4 Discharge Plan

Hygienetics, Inc./Geoscience Consultants, Ltd.

This document follows the format presented in "Guidelines for the Preparation of Ground Water Discharge Plans at Natural Gas Processing Plants."

1.0 General Information

1.1 Name of Discharger or Legally Responsible Party

Union Oil Company of California
dba Unocal
3300 North Butler Avenue, Suite 200
Farmington, NM 87401
(505) 326-7600

1.2 Name of Local Representative or Contact Person

Steven W. Gregory, District Safety and Environment Coordinator
Unocal Corporation
3300 North Butler Avenue, Suite 200
Farmington, NM 87401
(505) 326-7600

1.3 Location of Discharge

Section 20, Township 27 North, Range 6 West, NMPM
UTM East 277500, UTM North 4048100
Rio Arriba County, NM (plate 1)

1.4 Types of Natural Gas Operation

Field compression facility, which will be used for the transmission of pipeline quality gas (plate 2).

- **Process:** Pipeline quality gas enters the station at a relatively low pressure. The natural gas will be compressed and discharged into a pipeline leaving the station.

Unocal Corporation
Compressor Station Number 4 Discharge Plan

Hygienetics, Inc./Geoscience Consultants, Ltd.

- **Design Conditions: Single Stage Compression**

Gas Volume	1 MMSCFD
Station hp	335 hp

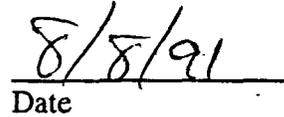
1.5 Copies

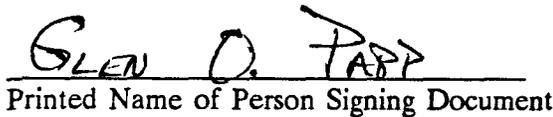
Three copies of Discharge Plan are submitted to OCD as required.

1.6 Affirmation

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


Signature


Date


Printed Name of Person Signing Document


Title

2.0 Plant Processes

2.1 Sources and Quantities of Effluent and Process Fluids

The natural gas stream entering the plant is a very lean gas with greater than 90% methane by volume.

- Fresh water will be used to clean or wash-down the compressors and engines. Contaminants in the water consist of dirt and small amounts of lubricating oil that may spill into the skid-mounted catch basin below the compressor during routine maintenance. Water collected in the catch basin will overflow into a

Unocal Corporation Compressor Station Number 4 Discharge Plan

Hygienetics, Inc./Geoscience Consultants, Ltd.

500 gallon underground storage tank. The usage rate of wash-down water is estimated at 10 gallons per month.

- During routine maintenance of the compressor engines, the oil in the engines will be changed approximately every 1,000 hours, at a oil usage rate of 15-20 gallons per month.
- A glycol coolant is added to the compressors as evaporation takes place. The replacement rate of the coolant is estimated to be 4-5 gallons per year.
- Water will be removed from the inlet gas streams via an inlet scrubber. Less than 5 barrels per day of water will be produced by the scrubber.

2.2 Quality Characteristics

- Unocal Guardol Motor Oil 30 or equivalent is used as the lubricating oil for the compressor engines. Refer to the Material Safety Data Sheets (MSDS) in appendix A for a description of this product.
- Dow Chemical Ethylene Glycol or equivalent is used as the coolant for the compressor engines. Refer to the Material Safety Data Sheets (MSDS) in appendix A for a description of this product.

2.3 Transfer and Storage of Process Fluids and Effluents

- Make-up engine oil will be stored in a 30 gallon above-ground drum. The drum will sit in an ecological pan which will contain any spills. Larger quantities of oil required for maintenance will be brought to the site on an as-needed basis in a dual tank truck. Used engine oil will be pumped into one storage tank on the truck and will be replaced with new engine oil from the other tank.
- Additional coolant will be stored on site in an above-ground 55-gallon. The drum will stand in an ecological pan which will contain any spills.
- Wash-down water will be piped to a 100 square foot evaporation pond. This pond will be lined with a 30 ml PVC underliner, a single layer 6 oz

Unocal Corporation
Compressor Station Number 4 Discharge Plan

Hygienetics, Inc./Geoscience Consultants, Ltd.

geotextile middle liner, and a 30 ml reinforced XR5 primary liner. The pond will be equipped with a vacuum-type leak detection system.

- Produced water will be piped into the same 100 square foot evaporation pond as the wash-down water.

2.4 Spill/Leak Prevention and Housekeeping Procedures

1. All operations personnel have been instructed to handle process fluid spills or leaks as follows:
 - Small spills: Cover spill with sand to soak up fluid and shovel fluid-soaked sand into drums for OCD approved disposal.
 - Large spills: Dike around spill and pump into drums. Call vacuum truck if necessary.
 - Any spill large enough to require a dike to contain it will be reported immediately by phone to the OCD. Verbal and written notification of leaks or spills will be made to OCD in accordance with OCD Rule 116.
2. A daily walk-through inspection will be performed by the compressor station operator.
3. All areas identified during operation as susceptible to leaks or spills will be paved, bermed, or otherwise contained to prevent the discharge of any effluents.

3.0 Effluent Disposal

All effluents from this site will be collected by a recycling contractor. This contractor will be approved by the New Mexico Environmental Improvement Division for the hauling and final disposition of the effluents.

The shipping agent contracted for off-site disposal is Mesa Oil, Inc., 4701 Broadway Boulevard SE, Albuquerque, New Mexico.

Unocal Corporation
Compressor Station Number 4 Discharge Plan

Hygienetics, Inc./Geoscience Consultants, Ltd.

4.0 Site Characteristics

4.1 Hydrologic Features

Based on information found in *Hydrogeology and Water Resources of San Juan Basin, New Mexico* by the New Mexico Bureau of Mines and Mineral Resources, the estimated depth to water is 450 feet.

The ground water aquifer in this area is most likely in the San Jose formation. Total dissolved solids (TDS) concentration is estimated to be from 500 to 1,500 mg/l.

4.2 Geologic Description of Discharge Site

Based on information found in *Hydrogeology and Water Resources of San Juan Basin, New Mexico* by the New Mexico Bureau of Mines and Mineral Resources, the formations in the area are characterized by intermittently occurring grey to yellow and purple clay; white to red silts; white to yellow fine grained massive-bedded sandstone; conglomerate; and red and green shale.

4.3 Flood Protection

Flood potential is very unlikely and flood protection is not necessary.

5.0 Additional Information

Produced water will not be present in the pipeline because all gas transported through this system will be a marketable, methane rich, pipeline quality gas.

Contractors used for the hauling and final disposal of the compressor oil will be approved by the New Mexico Environmental Improvement Division.

0540/PLAN4.DOC

Appendix A
Material Safety Data Sheets



MATERIAL SAFETY DATA SHEET

DOW CHEMICAL U.S.A. MIDLAND, MICHIGAN 48674 EMERGENCY (517) • 636 • 4400

Product Code: 30478

Page: 1

Product Name: ETHYLENE GLYCOL (REGULAR)

Effective Date: 06/18/90 Date Printed: 12/06/90

MSDS:000597

1. INGREDIENTS: (% w/w, unless otherwise noted)

Ethylene glycol CAS# 000107-21-1 >99%

This document is prepared pursuant to the OSHA Hazard Communication Standard (29 CFR 1910.1200). In addition, other substances not 'Hazardous' per this OSHA Standard may be listed. Where proprietary ingredient shows, the identity may be made available as provided in this standard.

2. PHYSICAL DATA:

BOILING POINT: 387.1F 197C
VAP PRESS: 0.12 mmHg @ 25C
VAP DENSITY: 2.14
SOL. IN WATER: Completely miscible.
SP. GRAVITY: 1.1155 @ 20/20C
APPEARANCE: Colorless liquid.
ODOR: Practically odorless.

3. FIRE AND EXPLOSION HAZARD DATA:

FLASH POINT: 247F, 119C
METHOD USED: Setflash

FLAMMABLE LIMITS
LFL: 3.2%
UFL: Not determined.

EXTINGUISHING MEDIA: Water fog, alcohol foam, CO₂, and dry chemical.

FIRE & EXPLOSION HAZARDS: None expected under normal storage and handling conditions (i.e. ambient temperatures). However,

(Continued On Page 2)

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M A T E R I A L S A F E T Y D A T A S H E E T

Dow Chemical U.S.A.* Midland, MI 48674 Emergency Phone: 517-636-4400

Product Code: 30478

Page: 3

Product Name: ETHYLENE GLYCOL (REGULAR)

Effective Date: 06/18/90 Date Printed: 12/06/90

MSDS:000597

6. HEALTH HAZARD DATA:

EYE: May cause slight transient (temporary) eye irritation.
Corneal injury is unlikely. Vapors or mists may irritate eyes.

SKIN CONTACT: Essentially nonirritating to skin.

SKIN ABSORPTION: Repeated skin exposure to large quantities may result in absorption of harmful amounts. The dermal LD50 has not been determined.

INGESTION: Single dose oral toxicity is moderate. Excessive exposure may cause central nervous system effects, cardio-pulmonary effects (metabolic acidosis), and kidney failure. The estimated lethal dose for an average person is 100 ml. The oral LD50 for rats is in the 6000-13,000 mg/kg range. Amounts ingested incidental to industrial handling are not likely to cause injury; however ingestion of larger amounts could cause serious injury, even death.

INHALATION: At room temperature, vapors are minimal due to low vapor pressure. If heated or sprayed as an aerosol, concentrations may be attained that are sufficient to cause irritation and other effects.

SYSTEMIC & OTHER EFFECTS: Excessive exposure may cause irritation to upper respiratory tract. Observations in animals include kidney and liver effects and deposition of calcium salts in various tissues after long-term dietary intake of ethylene glycol. Did not cause cancer in long-term animal studies. Based on animal studies, ingestion of ethylene glycol appears to be the major and possibly only route of exposure to produce birth defects. Exposures by inhalation (tested nose-only in animals) or skin contact, the primary routes of occupational exposure, have minimal or essentially no effect on the fetus. In studies on rats, ethylene glycol has been shown not to interfere with reproduction. In studies on mice, ingestion of

(Continued On Page 4)

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M A T E R I A L S A F E T Y D A T A S H E E T

Dow Chemical U.S.A.* Midland, MI 48674 Emergency Phone: 517-636-4400

Product Code: 30478

Page: 4

Product Name: ETHYLENE GLYCOL (REGULAR)

Effective Date: 06/18/90 Date Printed: 12/06/90

MSDS:000597

6. HEALTH HAZARD DATA: (CONTINUED)

ethylene glycol in large amounts caused a small decrease in the number of litters per pair, live pups per litter, and in live pup weight. Results of in vitro (test tube) mutagenicity tests have been negative. Results of mutagenicity tests in animals have been negative.

7. FIRST AID:

EYES: Irrigate immediately with water for at least 5 minutes.

SKIN: Wash off in flowing water or shower.

INGESTION: If swallowed, induce vomiting immediately as directed by medical personnel. Never give anything by mouth to an unconscious person.

INHALATION: Remove to fresh air if effects occur. Consult a physician.

NOTE TO PHYSICIAN: Early administration of ethanol may counter the toxic effects of ethylene glycol--metabolic acidosis and renal damage. Hemodialysis or peritoneal dialysis have been of benefit. New Eng. J. Med. 304:21 1981. Supportive care. Treatment based on judgment of the physician in response to reactions of the patient.

8. HANDLING PRECAUTIONS:

EXPOSURE GUIDELINE(S): OSHA PEL and ACGIH TLV are 50 ppm Ceiling for ethylene glycol vapor.

VENTILATION: Good general ventilation should be sufficient for most conditions. Local exhaust ventilation may be necessary

(Continued On Page 5)

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M A T E R I A L S A F E T Y D A T A S H E E T

Dow Chemical U.S.A.* Midland, MI 48674 Emergency Phone: 517-636-4400

Product Code: 30478

Page: 5

Product Name: ETHYLENE GLYCOL (REGULAR)

Effective Date: 06/18/90 Date Printed: 12/06/90

MSDS:000597

8. HANDLING PRECAUTIONS: (CONTINUED)

for some operations.

RESPIRATORY PROTECTION: Atmospheric levels should be maintained below the exposure guideline. When respiratory protection is required for certain operations, use an approved air-purifying respirator.

SKIN PROTECTION: Use impervious gloves when prolonged or frequently repeated contact could occur.

EYE PROTECTION: Use safety glasses. If vapor exposure causes eye discomfort, use a full-face respirator.

9. ADDITIONAL INFORMATION:

SPECIAL PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE: Avoid ingestion. Practice reasonable caution and personal cleanliness. Avoid skin and eye contact.

Trace quantities of ethylene oxide (EO) may be present in this product. While these trace quantities could accumulate in headspace areas of storage and transport vessels, they are not expected to create a condition which will result in EO concentrations greater than 0.5 ppm (8 hour TWA) in the breathing zone of the workplace for appropriate applications. OSHA has established a permissible exposure limit of 1.0 ppm 8 hr TWA for EO. (Code of Federal Regulations Part 1910.1047 of Title 29)

MSDS STATUS: Revised section 9 and regsheet.

(Continued On Page 6)

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M A T E R I A L S A F E T Y D A T A S H E E T

Dow Chemical U.S.A.* Midland, MI 48674 Emergency Phone: 517-636-4400

Product Code: 30478

Page: 6

Product Name: ETHYLENE GLYCOL (REGULAR)

Effective Date: 06/18/90 Date Printed: 12/06/90

MSDS:000597

REGULATORY INFORMATION: (Not meant to be all-inclusive--selected regulations represented.)

NOTICE: The information herein is presented in good faith and believed to be accurate as the effective date shown above. However, no warranty, express or implied, is given. Regulatory requirements are subject to change and may differ from one location to another; it is the buyer's responsibility to ensure that its activities comply with federal, state or provincial, and local laws. The following specific information is made for the purpose of complying with numerous federal, state or provincial, and local laws and regulations. See MSD Sheet for health and safety information.

U.S. REGULATIONS

SARA 313 INFORMATION: This product contains the following substances subject to the reporting requirements of Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 and 40 CFR Part 372:

CHEMICAL NAME	CAS NUMBER	CONCENTRATION
ETHYLENE GLYCOL	000107-21-1	99 %

SARA HAZARD CATEGORY: This product has been reviewed according to the EPA "Hazard Categories" promulgated under Sections 311 and 312 of the Superfund Amendment and Reauthorization Act of 1986 (SARA Title III) and is considered, under applicable definitions, to meet the following categories:

- An immediate health hazard
- A delayed health hazard

CANADIAN REGULATIONS

(Continued on Page 7)
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M A T E R I A L S A F E T Y D A T A S H E E T

Dow Chemical U.S.A.* Midland, MI 48674 Emergency Phone: 517-636-4400

Product Code: 30478

Page: 7

Product Name: ETHYLENE GLYCOL (REGULAR)

Effective Date: 06/18/90 Date Printed: 12/06/90

MSDS:000597

REGULATORY INFORMATION (CONTINUED)

The Workplace Hazardous Materials Information System (W.H.M.I.S.)
Classification for this product is:

D2A

The Transportation of Dangerous Goods Act (T.D.G.A.) classification for
this product is:

Not regulated

(R) Indicates a Trademark of The Dow Chemical Company
The Information Herein Is Given In Good Faith, But No Warranty,
Express Or Implied, Is Made. Consult The Dow Chemical Company
For Further Information.

* An Operating Unit of The Dow Chemical Company

UNOCAL

Product Name: UNOCAL GUARDOL MOTOR OIL 30
 Product Code No: 03650XX30

Page 1 of
 Issue Date: 6/5/

<p>MANUFACTURER: UNOCAL REFINING & MARKETING DIVISION UNION OIL COMPANY OF CALIFORNIA 1201 W. 5TH STREET LOS ANGELES, CALIFORNIA 90017</p> <p>CONTACT FOR FURTHER INFORMATION: MSDS COORDINATOR (213) 977-7589</p>	<p>Transportation Emergencies: Call CHEMTREC (800) 424-9300 Cont. U. (202) 483-7616 (Collect from Alaska & Hawaii Health Emergencies: CALL LOS ANGELES POISON INFORMATION CENTER (24 hr: (213) 664-2121</p>
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<p>PRODUCT IDENTIFICATION</p>	
<p>PRODUCT NAME:</p>	<p>UNOCAL GUARDOL MOTOR OIL 30</p>
<p>SYNONYMS:</p>	<p>UNION GUARDOL MOTOR OIL 30</p>
<p>GENERIC NAME:</p>	<p>CRANKCASE OIL</p>
<p>CHEMICAL FAMILY:</p>	<p>PETROLEUM HYDROCARBON</p>
<p>DOT PROPER SHIPPING NAME:</p>	<p>NOT APPLICABLE</p>
<p>ID NUMBER:</p>	<p>NONE</p>

SECTION I - INGREDIENTS	TLV	UNITS	AGENCY	TYPE
OIL MIST, IF GENERATED	5.00	MG/M3	OSHA	FULL TERM TWA
<p>THE IDENTITIES OF INGREDIENTS THAT ARE TRADE SECRETS ARE EXCLUDED FROM THIS LIST.</p>				

<p>SECTION II - EMERGENCY AND FIRST AID PROCEDURES</p>	<p>***EMERGENCY*** Have physician call LOS ANGELES POISON INFORMATION CENTER (24 hrs.) (213) 664-2121</p>
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EYE CONTACT:
 FOR DIRECT CONTACT, FLUSH THE AFFECTED EYE(S) WITH CLEAN WATER. IF IRRITATION OR REDNESS DEVELOPS, SEEK MEDICAL ATTENTION.

SKIN CONTACT:
 DO NOT USE GASOLINES, THINNERS OR SOLVENTS TO REMOVE PRODUCT FROM SKIN. WIPE MATERIAL FROM SKIN AND REMOVE CONTAMINATED CLOTHING. CLEANSE AFFECTED AREA(S) THOROUGHLY BY WASHING WITH SOAP AND WATER AND, IF NECESSARY, A WATERLESS SKIN CLEANSER. IF IRRITATION OR REDNESS DEVELOPS AND PERSISTS, SEEK MEDICAL ATTENTION.

SECTION IV - SPECIAL PROTECTION INFORMATION

EYE PROTECTION:

APPROVED EYE PROTECTION TO SAFEGUARD AGAINST POTENTIAL EYE CONTACT, IRRITATION OR INJURY IS RECOMMENDED.

OTHER PROTECTIVE EQUIPMENT:

IT IS SUGGESTED THAT A SOURCE OF CLEAN WATER BE AVAILABLE IN WORK AREA FOR FLUSHING EYES AND SKIN. BARRIER CREAMS THAT ARE SPECIFIC FOR OIL-BASED MATERIALS ARE RECOMMENDED WHEN GLOVES ARE IMPRACTICAL.

SECTION V - REACTIVITY DATA

STABILITY:

STABLE

INCOMPATIBILITY (MATERIALS TO AVOID):

AVOID CONTACT WITH STRONG OXIDIZING AGENTS. EXTENDED EXPOSURE TO HIGH TEMPERATURES MAY CAUSE DECOMPOSITION.

HAZARDOUS DECOMPOSITION PRODUCTS:

THERMAL DECOMPOSITION IN THE PRESENCE OF AIR MAY YIELD MAJOR AMOUNTS OF OXIDES OF CARBON AND MINOR AMOUNTS OF OXIDES OF NITROGEN, PHOSPHORUS, SULFUR AND ZINC.

HAZARDOUS POLYMERIZATION:

WILL NOT OCCUR

SECTION VI - SPILL OR LEAK PROCEDURES

HIGHWAY OR RAILWAY SPILLS
Call CHEMTREC (800) 424-9300 Cont. U.S.
(Collect) (202) 483-7616 from Alaska & Hawaii

PRECAUTIONS IN CASE OF RELEASE OR SPILL:

COLLECT LEAKING LIQUID IN SEALABLE CONTAINERS. ABSORB SPILLED LIQUID IN SAND OR INERT ABSORBANT. CONTACT FIRE AUTHORITIES AND APPROPRIATE STATE/LOCAL AGENCIES. IF SPILL OF ANY AMOUNT IS MADE INTO OR UPON U.S. NAVIGABLE WATERS, THE CONTIGUOUS ZONE, OR ADJOINING SHORELINES, NOTIFY COAST GUARD NATIONAL RESPONSE CENTER (PHONE NUMBER 800-424-8802).

WASTE DISPOSAL METHOD:

DISPOSE OF PRODUCT IN ACCORDANCE WITH LOCAL, COUNTY, STATE, AND FEDERAL REGULATIONS.

SECTION VII - STORAGE AND SPECIAL PRECAUTIONS

HANDLING AND STORAGE PRECAUTIONS:

STORE IN A COOL, DRY LOCATION. KEEP AWAY FROM INCOMPATIBLE MATERIALS (SEE SECTION V). AVOID GENERATING OIL MISTS WHILE HANDLING. AVOID PROLONGED OR REPEATED SKIN CONTACT. WASH THOROUGHLY AFTER HANDLING. FOR USED MOTOR OIL: LAUNDER SATURATED CLOTHING BEFORE WEARING AND DISCARD OIL-SOAKED SHOES AND UNWASHABLE CLOTHING.

SECTION XI - DOCUMENTARY INFORMATION

ISSUE DATE: 6/5/85 PRODUCT CODE NO. 03650XX30

PREV. DATE: 7/25/84 PREV. PROD. CODE NO. _____

MSDS NO: _____ PREV. MSDS NO: _____

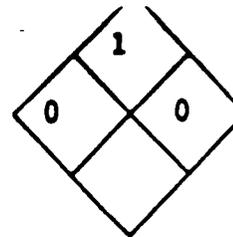
DISCLAIMER OF EXPRESSED AND IMPLIED WARRANTIES

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450540.

UNION 76
 Union Oil Company of California

UNION 76



UNION 76 DIVISION

MANUFACTURER

UNION 76 DIVISION - EAST, UNION OIL COMPANY OF CALIFORNIA
 61 SOUTH BOYLSTON STREET
 LOS ANGELES, CALIFORNIA 90017
 (213) 977-7589

Transportation Emergencies:

Call CHEMTREC (800) 424-9300
 For AK & HI: (202) 483-7616

Health Emergencies:

Call Los Angeles
 Poison Information Center (24 hrs.)
 (213) 664-2121

CONTACT: 76 DIVISION MSDS COORDINATOR

PRODUCT UNION HEAVY DUTY MOTOR OIL, 10W/30

COMMON NAME

GENERIC NAME CRANKCASE OIL

CHEMICAL NAME

CHEMICAL FAMILY PETROLEUM LUBE OIL

DOT PROPER SHIPPING NAME NOT APPLICABLE

WARNING STATEMENTS

Caution, can catch fire. Keep away from heat, sparks and flame. Avoid
 irritation of oil mists and prolonged or repeated skin contact. Do not cut,
 puncture or weld on or near product container. For industrial use only.
 PROLONGED OR REPEATED CONTACT WITH USED MOTOR OIL MAY BE A SKIN CANCER HAZARD.
 WASH SKIN WITH SOAP AND WATER.

SECTION I - INGREDIENTS

*THRESHOLD LIMIT VALUE SET BY: A. OSHA B. ACGIH C. SEE SECTION III D. OTHER E. NOT ESTABLISHED
 UNITS ARE IN ppm UNLESS SPECIFIED OTHERWISE TLV*

Oil mist, if generated

5 mg/m³ A, B

Zinc dialkyldithiophosphates (ZDDP)

< 2%

Not Established

Identities of ingredients that are trade secrets are
 excluded from this list.

SAFETY INFORMATION

If exposure exceeds the applicable TLV, a suitable filter-type respirator should be worn. SEE ADDENDUM

VENTILATION

General mechanical ventilation may be adequate for maintaining airborne concentrations below established exposure limits. If general ventilation is inadequate, supplemental local exhaust may be required. Other special precautions, such as respiratory protection, may be required if airborne concentrations cannot be reduced to below the TLV by ventilation.

PROTECTIVE GLOVES

The use of gloves that are impermeable to oils is advised to protect against skin irritation and absorption of zinc dialkyldithiophosphates.

EYE PROTECTION

Safety glasses, chemical goggles, and/or face shields are recommended to safeguard against potential eye contact, irritation, or injury.

OTHER PROTECTIVE EQUIPMENT

Use good personal hygiene practice. Sink and eye wash should be available in work area.

SECTION V - REACTIVITY DATA

STABILITY

STABLE

CONDITIONS TO AVOID

Avoid contact with any source of heat or flame.

STABILITY (MATERIALS) (TO AVOID)

Avoid contact with strong oxidizing agents such as chlorine, permanganates and dichromates.

HAZARDOUS DECOMPOSITION PRODUCTS

Thermal decomposition in the presence of air may yield major amounts of oxides of carbon and minor amounts of oxides of sulfur and nitrogen.

HAZARDOUS POLYMERIZATION

WILL NOT OCCUR

CONDITIONS TO AVOID

SECTION VI - SPILL OR LEAK PROCEDURES

HIGHWAY OR RAILWAY SPILLS. CALL CHEMTREC (800) 424-9300 For AK & HI: (202)483-7616

PRECAUTIONS IN CASE OF RELEASE OR SPILL

Stay upwind and away from spill unless wearing appropriate protective equipment (see Section IV). Stop and/or contain discharge if it can be done safely. Keep all sources of ignition and hot metal surfaces isolated from spill. Use non-sparking tools for cleanup. Keep out of drains, sewers or waterways. Contact fire authorities. Notify local health and pollution control agencies. Notify Coast Guard National Response Center (phone number 800-424-8802) if spill of any amount is made into or upon U.S. navigable waters, the contiguous zone, or adjoining shorelines. Consult 40 Code of Federal Regulations Part 110, and state and local law.

WASTE DISPOSAL METHOD

Dispose of product in accordance with local, county, state, and federal regulations.

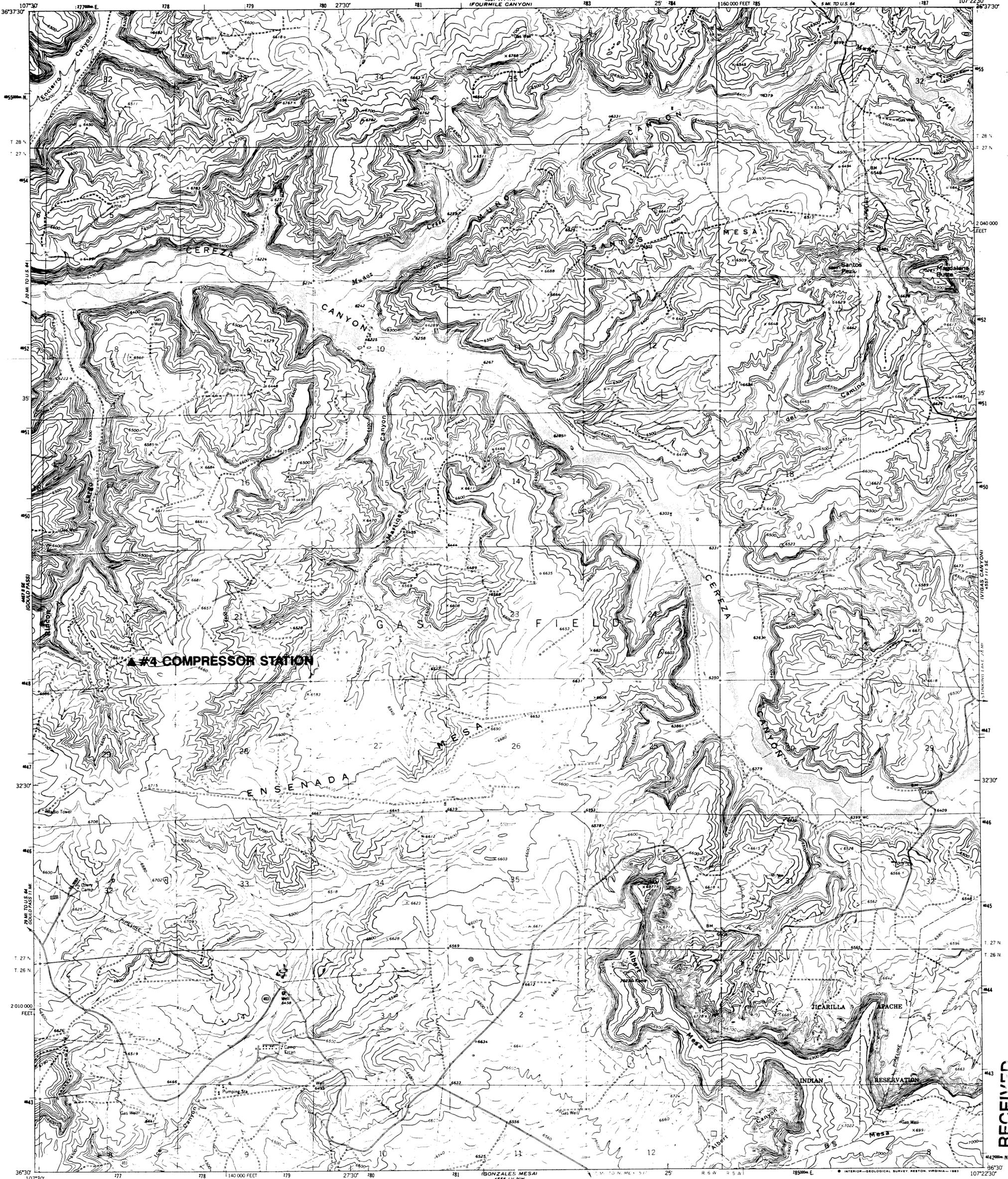
ADDENDUM

Section II - EMERGENCY AND FIRST AID PROCEDURES

Ingestion:

TO PHYSICIAN: Emesis or lavage is not recommended for minute quantities or tastes of most hydrocarbons. Medical opinion is divided for larger ingestions. Emesis or lavage have been recommended for those petroleum products which have a high oral toxicity. Gastric lavage with a cuffed endotracheal tube is recommended by some physicians to prevent aspiration.

UNOCAL #4 COMPRESSOR STATION LOCATION



Mapped, edited, and published by the Geological Survey

Control by USGS and NOS/NOAA

Topography by photogrammetric methods from aerial photographs taken 1958 and 1962. Field checked 1963

Polyconic projection 1927 North American datum
10 000-foot grid based on New Mexico coordinate system, central zone
1000-meter Universal Transverse Mercator grid ticks,
zone 13, shown in blue

To place on the predicted North American Datum 1983
move the projection lines 1 meter north and
54 meters east as shown by dashed corner ticks

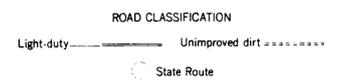
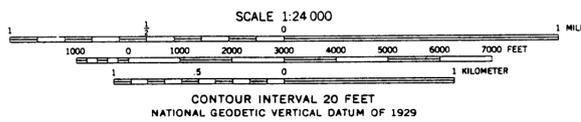
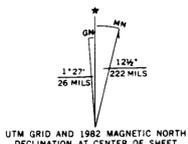


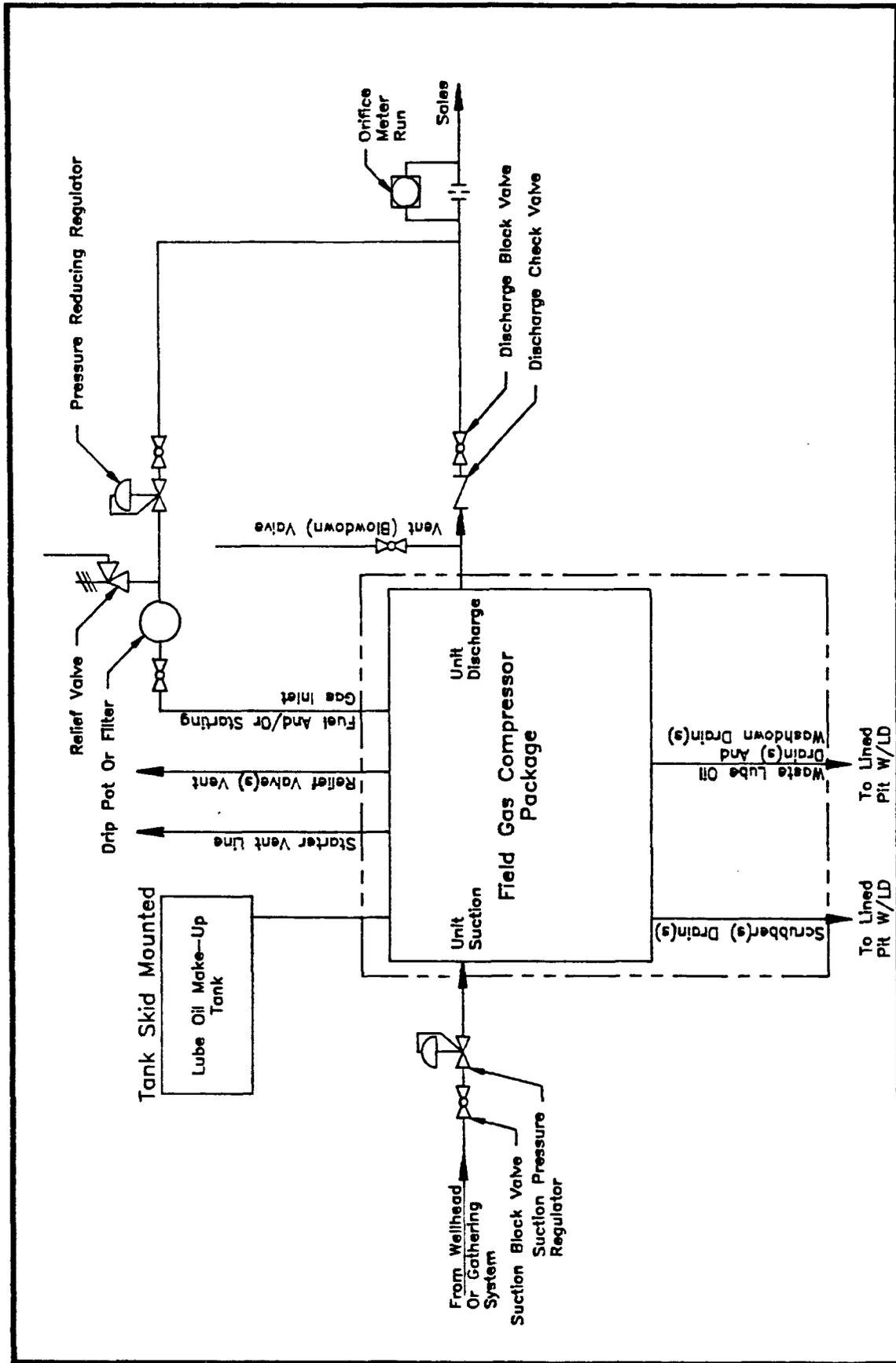
PLATE 1
SANTOS PEAK, N. MEX.
N3630-W10722.5/7.5
1963
PHOTOREVISED 1982
DMA 4557 111 SW-SERIES V881

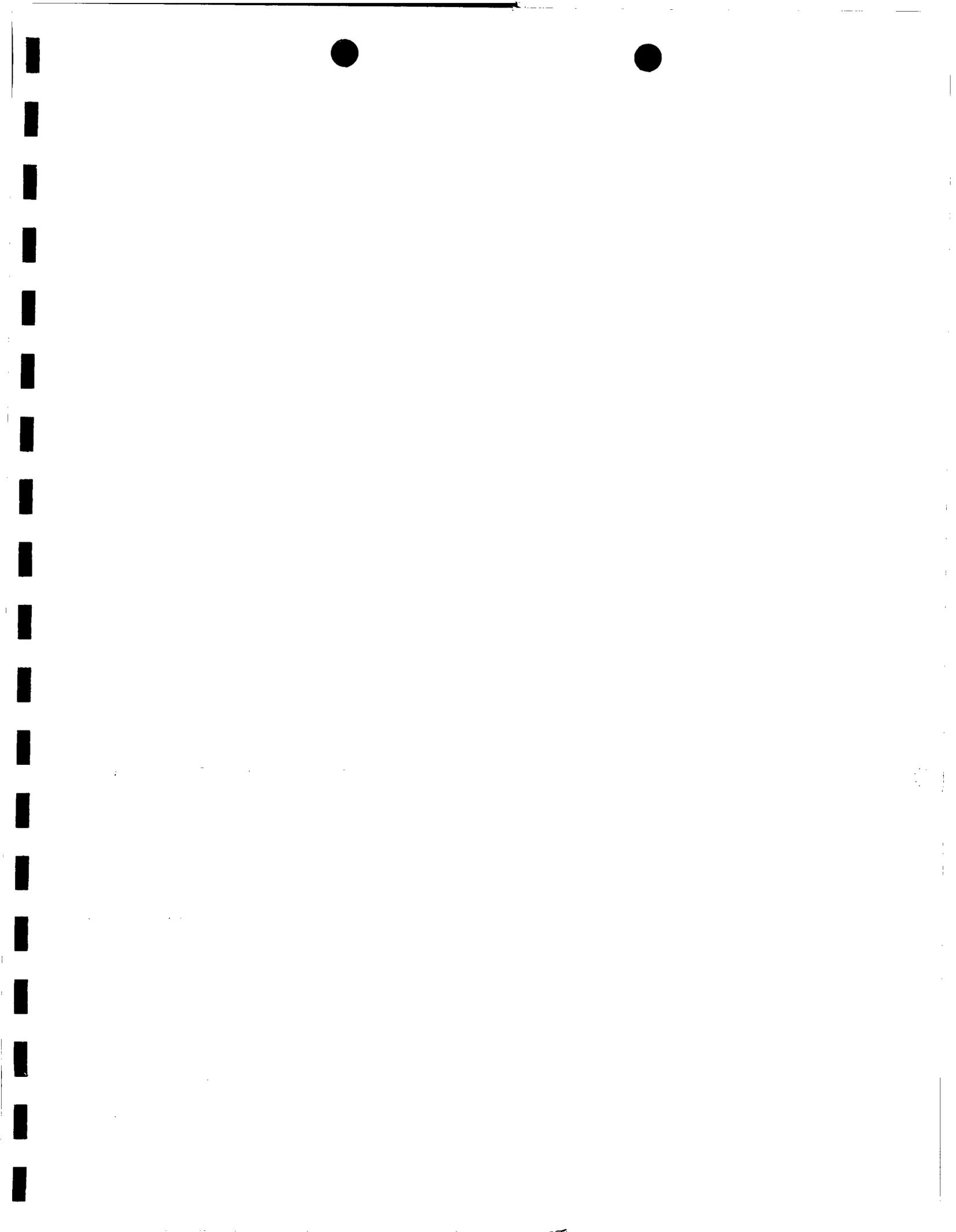
THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
FOR SALE BY U. S. GEOLOGICAL SURVEY, DENVER, COLORADO 80225, OR RESTON, VIRGINIA 22092
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST

RECEIVED
AUG 14 1991
OIL CONSERVATION DIV.
SANTA FE

Plate 2

Compressor Station Number 4 Installation Details







STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

October 11, 1991

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

CERTIFIED MAIL
RETURN RECEIPT NO. P-327-278-267

Mr. Glen O. Papp
UNOCAL Corporation
3300 North Butler Ave
Suite 200
Farmington, New Mexico 87401

RE: Discharge Plan GW-83
Compressor Station Number 4
Rio Arriba County, New Mexico

Dear Mr. Papp:

The groundwater discharge plan GW-83 for the UNOCAL Compressor Station Number 4 located in the SW/4 SE/4, Section 20, Township 27 North, Range 6 West, NMPM, Rio Arriba County, New Mexico is hereby approved. The discharge plan consists of the application dated August 2, 1991.

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

Please be advised that all exposed pits, including lined pits and open top tanks (tanks exceeding 16 feet in diameter) shall be screened, netted or otherwise rendered nonhazardous to wildlife including migratory birds.

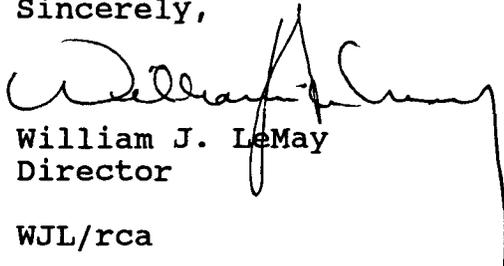
Please note that section 3-104 of the regulations requires that "When a plan has been approved, discharges must be consistent with the terms and conditions of the plan". Pursuant to Section 3-107.c. you are required to notify the Director of any facility expansion, production increase, or process modification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

Mr. Glen O. Papp
October 11, 1991
Page -2-

Pursuant to Section 3-109.g.4., this plan approval is for a period of five years. This approval will expire October 11, 1996 and you should submit an application for renewal in ample time before that date.

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

Sincerely,

A handwritten signature in black ink, appearing to read "William J. LeMay", with a long, sweeping underline that extends to the right.

William J. LeMay
Director

WJL/rca

xc: OCD Aztec Office

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

BRUCE KING
GOVERNOR

June 5, 1991

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

CERTIFIED MAIL
RETURN RECEIPT NO. P-327-278-145

Mr. Steven W. Gregory
Unocal Oil and Gas Division
3300 North Butler Avenue
Farmington, New Mexico 87401

RE: Discharge Plan Requirements

Dear Mr. Gregory:

The Oil Conservation Division (OCD) has received your Notice of Intent to Discharge, dated May 21, 1991, for four proposed compressor stations.

Under the provisions of the Water Quality Control Commission (WQCC) Regulations, you are hereby notified that the filing of discharge plans is required for the following compressor stations:

1. Compressor Station Number One
Section 1, Township 26 North, Range 7 West, Rio Arriba County, New Mexico.
2. Compressor Station Number Two
Section 13, Township 27 North, Range 7 West, Rio Arriba County, New Mexico.
3. Compressor Station Number Three
Section 27, Township 27 North, Range 6 West, Rio Arriba County, New Mexico.
4. Compressor Station Number Four
Section 20, Township 27 North, Range 6 West, Rio Arriba County, New Mexico.

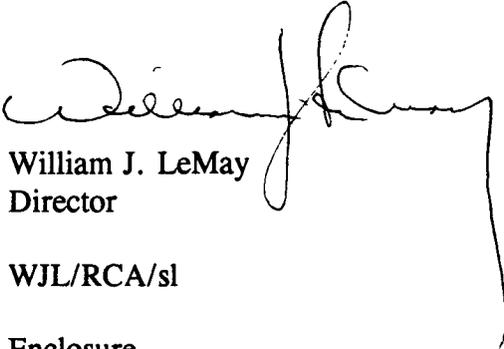
This notification of discharge plan requirement is pursuant to Sections 3-104 and 3-106 of the WQCC Regulations. The discharge plan, defined in Section 1.101.P. of the WQCC Regulations, should cover all discharges of effluent or leachate at the plant site or adjacent to the plant site. Included in the application should be plans for controlling spills and accidental discharges at the facility (including detection of leaks in buried underground tanks and/or piping).

Mr. Steven W. Gregory
June 5, 1991
Page -2-

A copy of the regulations is enclosed for your convenience. Also enclosed is a copy of an OCD guide to the preparation of discharge plans for gas processing plants. The guidelines are presently being revised to include berming of tanks, curbing and paving of process areas susceptible to leaks or spills and the disposition of any solid wastes. Three copies of your discharge plan should be submitted.

If there are any questions on this matter, please feel free to call David Boyer at 827-5812, or Roger Anderson at 827-5884 as they have the assigned responsibility for review of all discharge plans.

Sincerely,



William J. LeMay
Director

WJL/RCA/sl

Enclosure

cc: OCD Aztec Office

Geoscience Consultants, Ltd.

500 Copper Avenue N.W. Suite 200
Albuquerque, New Mexico 87102
(505) 842-0001 FAX (505) 842-0595



May 21, 1991

RECEIVED

MAY 22 1991

OIL CONSERVATION DIV.
SANTA FE

Mr. Roger Anderson
Oil Conservation Division
P.O. Box 2088, RM #206
Santa Fe, NM 87504

RE: COMPRESSOR STATION NUMBER FOUR NOTICE OF INTENT TO
DISCHARGE

Dear Mr. Anderson:

Enclosed is a Notice of Intent to Discharge for Unocal's compressor station number four located in Section 20, Township 27 North, Range 6 West, NMPM, Rio Arriba County.

The construction of the compressor station number four is scheduled to start in October, 1991.

We look forward to working with you as you review the Notice of Intent and your determination as for need of a Discharge Plan for compressor station number four.

Sincerely,
GEOSCIENCE CONSULTANTS, LTD.

A handwritten signature in cursive script, appearing to read "Gary L. Jordan".

Gary L. Jordan
Senior Engineer

GLJ/11b/0540/OCD004.LTR

Enclosure

cc: Steven W. Gregory, Unocal

NOTICE OF INTENT

1) Name and address of person making the discharge:

Unocal Oil and Gas Division
Unocal Corporation
3300 North Butler Avenue
Suite 200
Farmington, NM 87401
ATTN: Steven W. Gregory

2) Location of the discharge:

Compressor Station Number 4, Section 20, Township 27 North, Range 6 West,
NMPM (Plate 1).

3) Type of discharge:

- (1) Used lubricating oil, which is changed out from the compressor.
- (2) Ambitrol (Dow Chemical glycol), is used as a coolant for the compressors and is added as evaporation takes place.
- (3) Fresh water is used for wash down water to clean or wash down the compressors and engines.

4) The means of discharge:

- (1) The used lubricating oil is stored in an above ground tank and picked up by Mesa Oil for recycling.
- (2) Ambitrol (glycol) is not changed out, and is only added as needed.
- (3) Wash down water is held in a double-lined storage tank and then transported to an approved wastewater disposal site.

5) The type of operation from which the discharge is derived:

Compressor station number 4 is a field compression facility for compressing of "pipeline quality" gas.

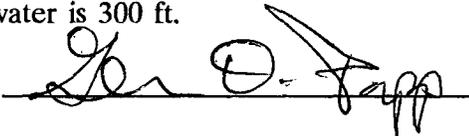
6) The estimated flow to be discharged per day:

- (1) Used lubricating oil is collected at a rate of 15-20 gallons per month.
- (2) Make up Ambitrol is added at a rate of 4-5 gallons per year.
- (3) Wash down water is collected at a rate of 10 gallons per month.

7) The estimated depth to ground water:

Based on well information from nearby water wells owned by Unocal, estimated depth to ground water is 300 ft.

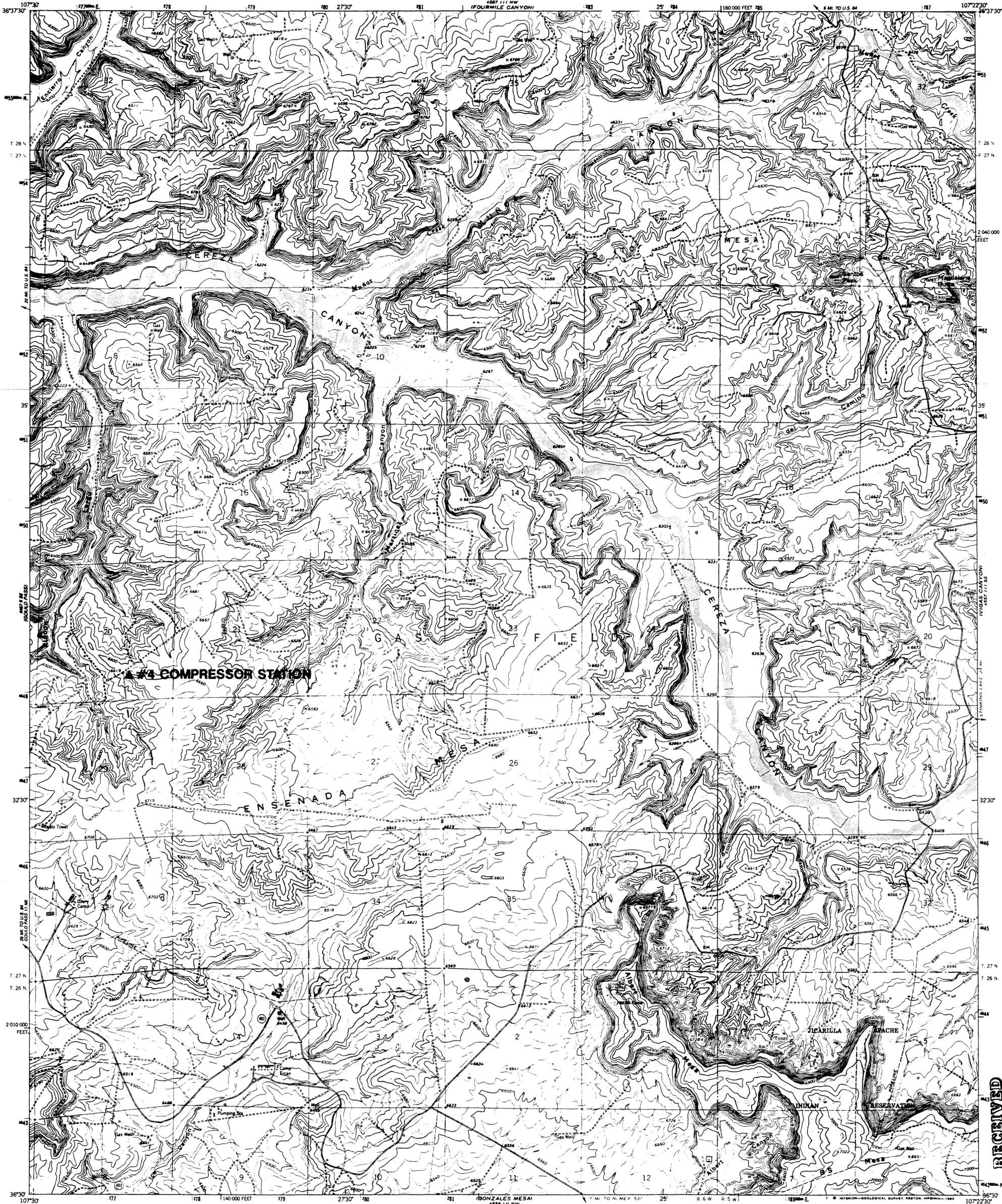
Signed: _____



Date: _____

5/17/91

UNOCAL #4 COMPRESSOR STATION LOCATION



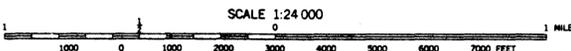
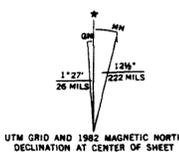
Mapped, edited, and published by the Geological Survey

Control by USGS and NOS/NOAA

Topography by photogrammetric methods from aerial photographs taken 1958 and 1962. Field checked 1963

Polyconic projection 1927 North American datum 10,000-foot grid based on New Mexico coordinate system, central zone 1000-meter Universal Transverse Mercator grid ticks, zone 13, shown in blue

To place on the predicted North American Datum 1983 move the projection lines 1 meter north and 54 meters east as shown by dashed corner ticks



CONTOUR INTERVAL 20 FEET
NATIONAL GEODETIC VERTICAL DATUM OF 1929

THIS MAP COMPLIES WITH NATIONAL MAP ACCURACY STANDARDS
FOR SALE BY U. S. GEOLOGICAL SURVEY, DENVER, COLORADO 80225, OR RESTON, VA 22092
A FOLDER DESCRIBING TOPOGRAPHIC MAPS AND SYMBOLS IS AVAILABLE ON REQUEST



QUADRANGLE LOCATION
Revisions shown in purple compiled from aerial photographs taken 1981 and other source data. Partial field check by U.S. Forest Service. Map edited 1982

ROAD CLASSIFICATION
Light-duty ————— Unimproved dirt - - - - -

State Route

PLATE 1 MAY 21 1991

SANTOS PEAK, N. MEX.
N3630-W10722.5/7.5
1963 NM01603
PHOTOREVISED 1982
DMA 4587 111 SW-SERIES V981

RECEIVED
MAY 21 1991
U.S. GEOLOGICAL SURVEY
SANTA FE

Geoscience Consultants, Ltd.

500 Copper Avenue N.W. Suite 200
Albuquerque, New Mexico 87102
(505) 842-0001 FAX (505) 842-0595



August 14, 1991

RECEIVED

AUG 14 1991

OIL CONSERVATION DIV.
SANTA FE

Mr. Roger Anderson
Oil Conservation Division
P.O. Box 2088, RM #206
Santa Fe, NM 87504

RE: COMPRESSOR STATION NUMBER FOUR DISCHARGE PLAN

Dear Mr. Anderson:

Enclosed are three copies of the Discharge Plan for Unocal's compressor station number four located in Section 20, Township 27 North, Range 6 West, NMPM, Rio Arriba County.

Construction of the compressor station number four is scheduled to start in October 1991.

If you have any questions or comments regarding this plan please contact me at 842-0001.

Sincerely,
H+GCL

Patrick J. O'Connell for

Gary L. Jordan
Senior Engineer

GLJ/llb/0540/ANDER004.LTR

Enclosure

cc: Steven W. Gregory, Unocal (with enclosure)

STATE OF NEW MEXICO
County of Bernalillo

ss

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

for.....1.....times, the first publication being on the.....12.....day
of.....Sept....., 1991, and the subsequent consecutive
publications on....., 1991.

Thomas J. Smithson

Sworn and subscribed to before me, a Notary Public in
and for the County of Bernalillo and State of New
Mexico, this12..... day of.....Sept....., 1991.

PRICE.....\$ 51.11.....

Statement to come at end of month.

ACCOUNT NUMBER.....C 81184.....

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

OIL CONSERVATION DIVISION

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

(GW-70)-Union Oil Company of California, DBA UNOCAL, Glen O. Papp, District Production Engineer, 3300 North Butler, Suite 200, Farmington, New Mexico, 87401, has submitted a discharge plan application for its Compressor Station Number 1 located in the NW/4, NW/4, Section 1 Township 26 North, Range 7 West, NMPM, Rio Arriba County, New Mexico. Approximately 4 gallons per day of washdown water and natural gas liquids will be collected in a double lined pond equipped with leak detection prior to disposal at an OCD approved offsite disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth in excess of 400 feet with a total dissolved solids concentration ranging from 500 mg/l to 1500 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

(GW-81)-Union Oil company of California, DBA UNOCAL, Glen O. Papp, District Production Engineer, 3300 North Butler, Suite 200, Farmington, New Mexico 87401, has submitted a discharge plan application for its Compressor Station Number 2 located in the SW/4, SW/4, Section 13, Township 27 North, Range 7 West, NMPM, Rio Arriba County, New Mexico. Approximately 4 gallons per day of washdown water and natural gas liquids will be collected in a double lined pond equipped with leak detection prior to disposal at an OCD approved offsite disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth in excess of 550 feet with a total dissolved solids concentration ranging from 500 mg/l to 1500mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

(GW-82)-Union Oil Company of California, DBA UNOCAL, Glen O. Papp, District Production Engineer, 3300 North Butler, Suite 200, Farmington, New Mexico 87401, has submitted a discharge plan application for its Compressor Station Number 3 located in the NE/4, NE/4, Section 27, Township 27 North, Range 8 West, NMPM, Rio Arriba County, New Mexico. Approximately 4 gallons per day of washdown water and natural gas liquids will be collected in a double lined pond equipped with leak detection prior to disposal at an OCD approved offsite disposal facility.

OFFICIAL SEAL
Bernadette Ortiz
BERNADETTE ORTIZ
NOTARY PUBLIC-NEW MEXICO
WITH SECRETARY OF STATE
Expires 12-18-93

CLA-22-A (R-12/91)

OIL

'91

(GW-83)-Union Oil Company of California, DBA UNOCAL, Glen O. Papp, District Production Engineer, 3300 North Butler, Suite 200, Farmington, New Mexico 87401, has submitted a discharge plan application for its Compressor Station Number 4 located in the SW/4, SE/4, Section 20, Township 27 North, Range 6 West, NMPM, Rio Arriba County, New Mexico. Approximately 4 gallons per day of washdown water and natural gas liquids will be collected in a double lined pond equipped with leak detection prior to disposal at an OCD approved offsite disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth in excess of 450 feet with a total dissolved solids concentration ranging from 500 mg/l to 1500 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

(GW-35)-Conoco Inc., Rick McCallip, Director, Safety and Environmental Services, Natural Gas and Gas Products Department, P.O. Box 2197, HU 3034, Houston, Texas, 77252, has submitted an application for discharge plan renewal for its San Juan Basin Gas Processing Plant located in the NW/4, NW/4, Section 14, Township 29 North, Range 11 West, NMPM, San Juan County, New Mexico. Approximately 180,000 gallons per day of cooling tower wastewater is discharged to the City of Bloomfield Wastewater Treatment Facility. Groundwater most likely to be affected by an accidental discharge is at a depth of from 15 feet to 55 feet with a total dissolved solids concentration in excess of 4400 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 5th day of August, 1991.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
WILLIAM J. LEMAY, Director
Journal: September 12, 1991.

AFFIDAVIT OF PUBLICATION

No. 28272

STATE OF NEW MEXICO,
County of San Juan:

CHRISTINE HILL being duly sworn, says: "That she is the NATIONAL AD MANAGER of The Farmington Daily Times, a daily newspaper of general circulation published in English in Farmington, said county and state, and that the hereto attached LEGAL NOTICE

was published in a regular and entire issue of the said Farmington Daily Times, a daily newspaper duly qualified for the purpose within the meaning of Chapter 167 of the 1937 Session Laws of the State of New Mexico for ONE consecutive (days) (/////) on the same day as follows:

- First Publication THURSDAY, SEPTEMBER 5, 1991
- Second Publication _____
- Third Publication _____
- Fourth Publication _____

and that payment therefore in the amount of \$ 77.12 has been made.

COPY OF PUBLICATI

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

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

(GW-70)-Union Oil Company of California, DBA UNOCAL, Glen O. Papp, District Production Engineer, 3300 North Butler, Suite 200, Farmington, New Mexico 87401, has submitted a discharge plan application for its Compressor Station Number 2 located in the SW/4, SW/4, Section 13, Township 26 North, Range 7 West, NMPM, Rio Arriba County, New Mexico. Approximately 4 gallons per day of washdown water and natural gas liquids will be collected in a double lined pond equipped with leak detection prior to disposal at an OCD approved offsite disposal facility. Groundwater most likely to be affected by an accidental discharge is at a depth in excess of 400 feet with a total dissolved solids concentration ranging from 500 mg/l to 1500 mg/l. The discharge plan addresses how spills, leaks and other accidental discharges to the surface will be managed.

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NOTICE OF PUBLICATION

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ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION**

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 30th day of August, 1991.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION


WILLIAM J. LEMAY, Director

S E A L



UNITED STATES
DEPARTMENT OF THE INTERIOR

FISH AND WILDLIFE SERVICE

Ecological Services

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

October 9, 1991

Mr. William J. Lemay
Director, New Mexico Energy, Minerals
and Natural Resources Department
Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504-2088

Dear Mr. Lemay:

This responds to the Public Notice dated August 30, 1991, regarding the effects of granting State of New Mexico groundwater discharge permits on fish, shellfish, and wildlife resources in New Mexico.

The U.S. Fish and Wildlife Service (Service) has determined there are no wetlands or other environmentally sensitive habitats that will be adversely affected by the following discharges. Our data indicate no listed species would be affected by the proposed action.

GW-70 Union Oil Company of California, Compressor Station No. 1,
Section 1, T26N, R7W, Rio Arriba County, New Mexico

GW-81 Union Oil Company of California, Compressor Station No. 2,
Section 13, T27N, R7W, Rio Arriba County, New Mexico

GW-82 Union Oil Company of California, Compressor Station No. 3,
Section 27, T27N, R6W, Rio Arriba County, New Mexico

GW-83 Union Oil Company of California, Compressor Station No. 4,
Section 20, T27N, R6W, Rio Arriba County, New Mexico

GW-35 Conoco Inc., Section 14, T29N, R11W, San Juan County,
New Mexico

Direct adverse impacts to migratory birds will occur from petroleum hydrocarbon contamination if the birds gain access to oil that is present on the ponds. Migratory birds that become covered by or ingest oil typically suffer mortality due to hypothermia or poisoning. The Service recommends that all tanks and ponds, regardless of size, be netted to prevent access by migratory birds.

Mr. William J. Lemay

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Migratory birds are protected under the Migratory Birds Treaty Act (MBTA). If migratory birds become exposed to or accumulate harmful levels of contaminants, this constitutes "take" under the MBTA. The MBTA makes it unlawful for anyone at any time or in any manner to ". . . kill . . ." any migratory birds unless permitted by regulations promulgated under the Act. The courts have stated that the MBTA can be constitutionally applied to impose penalties to persons, associations, partnerships, or corporations that did not intend to "kill" migratory birds and that the MBTA includes poisoning by any means. The MBTA holds that the unlawful killing of even one migratory bird is an offense.

These comments represent the views of the Fish and Wildlife Service. If you have any questions, please contact Scott Hamilton-McLean at (505) 883-7877.

Sincerely,


for Jennifer Fowler-Propst
Field Supervisor

cc:

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