GW - 113

GENERAL CORRESPONDENCE

YEAR(S): 2002 - 1992

Northern Natural Gas Company
P.O. Box 3330
Omaha, NE 68103-0330
402-398-7200

October 7, 2002

Mr. Roger C. Anderson
New Mexico Oil Conservation Division
Santa Fe Office
1220 South St. Francis Drive
Santa Fe, NM 87505

GW-113

Dear Mr. Anderson:

Attached are the ground water discharge plan renewals for Northern Natural Gas Company Eunice Compressor Station (GW-113) and Jal Compressor Station (GW-283) located in Lea County. These facilities are currently owned and operated by Northern Natural Gas Company rather than Transwestern Pipeline Company as noted in the letter and renewal. A check for $1,800 is attached to cover each application and renewal fee.

Rick Loveless had spoken with your office and was granted an extension of the 30-day requirement to submit the fee and renewal because of delays in receiving the letter from Transwestern.

Sincerely,

Richard D. Melton

Richard Melton
Sr. Director, Pipeline Integrity & Environmental

Checks returned for signatures on 10/11/02 ld

ATTACHMENT TO THE DISCHARGE PLAN RENEWAL GW-113
~~TRANSWESTERN PIPELINE CO.~~ NORTHERN NATURAL GAS COMPANY
EUNICE COMPRESSOR STATION (Northern)
DISCHARGE PLAN APPROVAL CONDITIONS
September 3, 2002

1. Payment of Discharge Plan Fees: **The $100.00 filing fee and the $1,700.00 flat fee are due upon receipt of this approval; total due upon receipt, $1,800.00.** All checks are to be made payable to Water Quality Management Fund and forwarded to the OCD Santa Fe Office. Please note the new mailing address on letterhead.

2. Commitments: ~~Transwestern Pipeline Co.~~ Northern will abide by all commitments submitted in the discharge plan renewal application letter dated December 2, 2001 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. Rule 712 Waste: Pursuant to Rule 712, disposal of certain non-domestic waste is permitted at solid waste facilities permitted by the New Mexico Environment Department as long as:
    1. the waste stream is identified, and authorized, as such in the discharge plan, and;
    2. existing process knowledge of such waste streams does not change without notification to the Oil Conservation Division.

4. Drum Storage: All drums containing material 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 below grade tanks and sumps must be tested annually. Results of such tests shall be maintained at the facility covered by this discharge plan and available for NMOCD inspection. Permit holders 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 approved by the OCD prior to installation and must be tested to demonstrate their mechanical integrity every five (5) years. Results of such tests shall be maintained at the facility covered by this discharge plan and available for NMOCD inspection. Permit holders 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 approved for construction and/or operation unless it can be demonstrated that groundwater will 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 Hobbs 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: Northern ~~Transwestern Pipeline Co.~~ shall maintain storm water runoff controls. As a result of operations, if any water contaminant that exceeds the WQCC standards listed in 20 NMAC 6.2.3101 is discharged in any storm water run-off, then Northern ~~Transwestern Pipeline Co.~~ shall: take immediate actions to mitigate the effects of the run-off, notify the OCD within 24 hours, and modify the discharge plan to include a formal storm water run-off containment plan and submit for OCD approval within 15 days.

16. Closure: The OCD will be notified when operations of the Eunice Compressor Station are discontinued for a period in excess of six months. Prior to closure of the facility, the company 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.

17. Conditions accepted by: Northern ~~Transwestern Pipeline Co.~~ by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Northern ~~Transwestern Pipeline Co.~~ further acknowledges that the Division for good cause shown as necessary to protect fresh water, human health and the environment may change the conditions and requirements of this permit administratively.

Northern Natural Gas Company
~~Transwestern Pipeline Co.~~

Print Name: Mark Hewett

Signature: [signature]

Title: President

Date: 10-8-02

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 10/7/02,

or cash received on 10/25/02 in the amount of $ 1800.00

from NORTHERN NATURAL GAS Co.

for EUNICE COMPRESSOR STA. 113
(Facility Name) (DP No.)

Submitted by: _____ Date: _____

Submitted to ASD by: ED MARTIN Data: 10/25/02

Received in ASD by: _____ Data: _____

Filing Fee ✓ New Facility ___ Renewal ✓

Modification ___ Other _____
(specify)

Organization Code 521.07 Applicable FY 2001

To be deposited in the Water Quality Management Fund.

Full Payment ✓ or Annual Increment ___

[redacted]

NORTHERN NATURAL GAS COMPANY
1000 LOUISIANA, SUITE 5800
HOUSTON, TX 77002-5050

CITIBANK DELAWARE
NEW CASTLE, DE 19720
62-20-311

DATE 10/7/2002 CHECK NO [redacted]

Details on back. Security Features Included.

*****One Thousand and Eight Hundred Dollars and no/100***** AMOUNT $1,800.00

PAY TO THE ORDER OF
New Mexico Quality Management Fund
1220 So. St. Francis Dr.
Santa Fe, New Mexico 87505

[redacted]

MP

ATTENTION PLATINUM USER: PLEASE DETACH THIS PORTION AFTER LASER PRINTING

Martin, Ed

From: Martin, Ed
Sent: Wednesday, April 10, 2002 7:42 AM
To: 'Campbell, Larry'
Subject: RE: Drain llne Testing

This plan is approved as stated. Please let me have a summary of the results of the tests when complete. Take care.
Ed

-----Original Message-----
From: Campbell, Larry [mailto:Larry.Campbell@ENRON.com]
Sent: Tuesday, April 09, 2002 11:48 AM
To: EMARTIN@state.nm.us
Subject: Drain lIne Testing

Ed, when you were in the Hobbs area last month inspecting a couple of compressor stations operated by Transwestern Pipeline Company, I requested that Transwestern be given approval to conduct the 5 year drain line testing requirements at its 13 compressor stations which are currently under OCD discharge plans, prior to the five renewal date on the permit. The reason for this request is to reduce the price of sending a contractor out multiple times to do drain line testing when it would benefit Transwestern if the contractor could start at one end of our pipeline system and move concurrently from station to station and complete the testing for the al the compressor station along the entire pipeline in New Mexico. I am proposing to use the same methodology as was previously approved by your agency for the last drain line testing and propose to conduct the testing during the month of July. The list of facilities which are covered under this request are as follows:

Transwestern Pipeline Company

Wt-1 Compressor Station	GW-109
Mountainair Compressor Station	GW-110
Laguna Compressor Station	GW- 95
Thoreau Compressor Station	GW- 80
Bloomfield Comrpessor Station	GW- 84
Portales Compressor Station	GW- 90
Bisti Compressor Station	GW-285
Roswell Compressor Station	GW- 52
Gallup Compressor Station	GW-325
Monument Compressor Station	GW-197
Corona Compressor Station	GW- 89

Northern Natural Gas Company

Eunice Compressor Station	GW-113
Jal Compressor Station	GW-283

Ed, give me your thoughts on this.

Thanks

THE SANTA FE
NEW MEXICAN
Founded 1849

NM OIL CONSERVATION DIVISION
ENVIRONMENT BUREAU
1220 S. ST. FRANCIS
SANTA FE, NM 87505

AD NUMBER: 252372 ACCOUNT: 56689
LEGAL NO: 71082 P.O.#: 02199000249
281 LINES 1 time(s) at $ 123.87
AFFIDAVITS: 5.25
TAX: 8.07
TOTAL: 137.19

AFFIDAVIT OF PUBLICATION

OIL CONSERVATION DIV.
02 MAR 27 PM 1:04

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, K. Voorhees being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily newspaper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication #71082 a copy of which is hereto attached was published in said newspaper 1 day(s) between 03/22/2002 and 03/22/2002 and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 22 day of March, 2002 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/ K. Voorhees
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this
25 day of March A.D., 2002

Notary Laura E. Harding

Commission Expires 11/23/03

NOTICE OF PUBLICATION

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

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

(GW-113) - Transwestern Pipeline Co., Mr. Larry Campbell, Division Environmental Specialist, 6381 North Main Street, Roswell, NM 88201, has submitted a discharge plan renewal application for their Eunice Compressor Station located in the NW/4 of Section 27, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most likely to be affected by an accidental discharge to the surface is at a depth of approximately 50 feet with a total dissolved solids concentration of approximately 1500 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-283) - Transwestern Pipeline Co., Mr. Larry Campbell, Division Environmental Specialist, 6381 North Main Street, Roswell, NM 88201, has submitted a discharge plan renewal application for their Jal Compressor Station located in the NW/4 of Section 33, Township 25 South, Range 37 East, NMPM, Lea County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most likely to be affected by an accidental discharge to the surface is at a depth of approximately 100 feet with a total dissolved solids concentration of approximately 100 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-109) - Transwestern Pipeline Co., Mr. Larry Campbell, Division Environmental Specialist, 6381 North Main Street, Roswell, NM 88201, has submitted a discharge plan renewal application for their Carlsbad (WT-1) Compressor Station located in the SW/4 of Section 31, Township 20 South, Range 32 East, NMPM, Eddy County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most likely to be affected by an accidental discharge to the surface is at a depth of approximately 30 feet with a total dissolved solids concentration of approximately 1500 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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

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

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

GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 15th day of March 2002.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
SEAL

LORI WROTENBERY, Director
Legal #71082
Pub. March 22, 2002

AFFIDAVIT OF PUBLICATION

State of New Mexico,
County of Lea.

I, KATHI BEARDEN

Publisher

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

of 1

weeks.

Beginning with the issue dated

March 19 2002

and ending with the issue dated

March 19 2002

Kathi Bearden

Publisher

Sworn and subscribed to before me this 19th day of

March 2002

Jodi Henson

Notary Public.

My Commission expires
October 18, 2004
(Seal)

LEGAL NOTICE
March 19, 2002
NOTICE OF PUBLICATION

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

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(GW-283) – Transwestern Pipeline Co., Mr. Larry Campbell, Division Environmental Specialist, 6381 North Main Street, Roswell, NM 88201, has submitted a discharge plan renewal application for their Jal Compressor Station located in the NW/4 of Section 33, Township 25 South, Range 37 East, NMPM, Lea County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most likely to be affected by an accidental discharge to the surface is at a depth of approximately 100 feet with a total dissolved solids concentration of approximately 100 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 15th day of March 2002.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

(seal)
LORI WROTENBERY, Director
#18828

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

01100060000 02554286

State of New Mexico Oil &
1220 S. St. Francis
Santa Fe, NM 87505

NOTICE OF PUBLICATION

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ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT
OIL CONSERVATION DIVISION

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GIVEN under the Seal of New Mexico Conservation Commission at Santa Fe, New Mexico, on this 15th day of March 2002.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

LORI WROTENBERY, Director

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 January 24, 2001

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 X☐ Renewal ☐ Modification

1. Type: _Natural Gas Pipeline Compressor Station

2. Operator: Northern Natural Gas Company, Eunice Compressor Station (GW-113)

Address: 6381 North Main Street, Roswell New Mexico 88201

Contact Person: Larry Campbell Phone: (505) 625-8022

3. Location: NW /4 /4 Section 27 Township 22 S Range 37 E
Submit large scale topographic map showing exact location.

4. Attach the name, telephone number and address of the landowner of the facility site. Same as original application.

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

6. Attach a description of all materials stored or used at the facility. Same as original application.

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

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

9. Attach a description of proposed modifications to existing collection/treatment/disposal systems. Same as original application.

10. Attach a routine inspection and maintenance plan to ensure permit compliance. Same as original application.

11. Attach a contingency plan for reporting and clean-up of spills or releases. Same as original application.

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

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

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 [redacted]

Title: Divisi[redacted]nvironmental Specialist

Signature: _____

Date: _12/02/01_____

Larry Campbell
Division Env. Specialist

Northern Natural Gas Company
6381 North Main Street
Roswell, NM 88201

505-625-8022
Fax 505-627-8172
Pager 800-632-9229
Cellular 505-626-6211
lcampbe@enron.com

December 2, 2001

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

Re: Renewal of Groundwater Discharge Plans for (2) Northern Natural Gas Company Facilities

Dear Mr. Martin:

By this letter, Northern Natural Gas Company, requests renewal by the Oil Conservation Division (OCD) for the two (2) discharge charge plans referenced below:

Jal Compressor Station	GW-283
Eunice Compressor Station	GW-113

Under the conditions of this renewal request, be advised that there have been no modifications or alterations performed or constructed at any of the above referenced facilities which would differ from the facility conditions originally presented to the OCD in Transwestern's last discharge plan renewal application. Additionally, there have been no changes in operating ting practises currently performed at each facility which would differ from those practices which were presented in the last renewal application for each facility.

On December 2, 2001, Transwestern submitted via e-mail to the OCD, renewal applications for each facility listed above. Each form required signature. My signature on this letter constitutes the required signature for each application.

Should you require any additional information concerning this renewal request, contact the undersigned at our Roswell Technical Operations at (505) 625-8022.

Sincerely,

Larry Campbell

Larry Campbell
Division Environmental Specialist
xc: file

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

November 10, 1997

P 288 258 995

CERTIFIED MAIL
RETURN RECEIPT NO. P-288-258-995

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail *(See reverse)*

Sent to	
Street & Number	
Post Office, State, & ZIP Code	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date	

PS Form **3800**, April 1995

Mr. James R. Russell
Transwestern Pipeline Company
Summit Office Bldg., Suite 250
4001 Indian School Road, NE
Albuquerque, New Mexico 87110

RE: Discharge Plan GW-113 Renewal
Eunice Compressor Station
Lea County, New Mexico

Dear Mr. Russell:

The ground water discharge plan GW-113, for the Transwestern Pipeline Company (Transwestern) Eunice Compressor Station located in the NW/4 of Section 27, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico, **is hereby approved** under the conditions contained in the enclosed attachment. The discharge plan consists of the original discharge plan as approved June 19, 1992, and the discharge plan renewal application dated June 23, 1997. 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 discharge plan was submitted pursuant to Section 3106 of the New Mexico Water Quality Control Commission (WQCC) Regulations. It is approved pursuant to Section 3109.A. Please note Sections 3109.E and 3109.F., which provide for possible future amendments or modifications of the plan. Please be advised that approval of this plan does not relieve Transwestern of liability should operations result in pollution of surface water, ground water, or the environment.

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

Please note that Section 3104 of the regulations require "When a facility has been approved, discharges must be consistent with the terms and conditions of the plan." Pursuant to Section 3107.C. Transwestern 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.G.4., this plan is for a period of five years. This approval will expire on June 19, 2002, and Transwestern 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 renewal.

The discharge plan renewal application for the Transwestern Pipeline Company Eunice Compressor Station is subject to WQCC Regulation 3114. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of $50 plus a flat fee of $690 for compressor stations. The OCD has received the filing fee and the flat fee.

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,

William J. LeMay by RC

William J. LeMay
Director

WJL/mwa
Attachment

xc: OCD Hobbs Office

ATTACHMENT TO THE DISCHARGE PLAN GW-113 RENEWAL
TRANSWESTERN PIPELINE COMPANY
EUNICE COMPRESSOR STATION
DISCHARGE PLAN APPROVAL CONDITIONS
(November 10, 1997)

1. Transwestern Commitments: Transwestern will abide by all commitments submitted in the discharge plan application dated June 23, 1997.

2. Waste Disposal: All wastes shall 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 by characteristics may be disposed of at an OCD approved facility upon proper waste characterization per 40 CFR Part 261.

3. 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.

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5. 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 facilities or modifications to existing facilities must place the tank on an impermeable type pad within the berm.

6. 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.

7. Labeling: All tanks, drums and containers should be clearly labeled to identify their contents and other emergency information necessary if they were to rupture, spill, or ignite.

8. 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 pre-existing sumps and below-grade tanks must demonstrate integrity on an annual basis. Integrity tests include 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.

9. Underground Process/Wastewater Lines: All underground process/wastewater pipelines must be tested to demonstrate their mechanical integrity at present and then every 5 years thereafter, or prior to discharge plan renewal. Permittees 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.

10. Class V Wells: Leach fields and other wastewater disposal systems at OCD regulated facilities which inject fluid other than domestic waste sewage below the surface are considered Class V injection wells under the EPA UIC program. All class V wells will be closed unless, it can be demonstrated that protectable groundwater will not be impacted in the reasonably foreseeable future. Class V wells must be closed through the Santa Fe Office. The OCD allows industry to submit closure plans which are protective of human health, environment and groundwater as defined by the WQCC, and are cost effective.

11. Housekeeping: All systems designed for spill collection/prevention should be inspected to ensure proper operation and to prevent overtopping or system failure.

12. Spill Reporting: All spills/releases shall be reported pursuant to OCD Rule 116 and WQCC 1203 to the OCD Hobbs District Office.

13. 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.

14. Closure: The OCD will be notified when operations of the facility are discontinued for a period in excess of six months. Prior to closure of the facility a closure plan will be submitted for approval by the Director. Closure and waste disposal will be in accordance with the statutes, rules and regulations in effect at the time of closure.

15. Certification: Transwestern, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Transwestern further acknowledges that these conditions and requirements of this permit may be changed administratively by the Division for good cause shown as necessary to protect fresh water, human health and the environment.

Accepted:

TRANSWESTERN PIPELINE COMPANY

by_____
Title

Martin, Ed

To: Larry Campbell (E-mail)
Subject: Discharge Plans

Here's a listing of the permits expiring over the next year or so:

GW-90	Portales C.S.	Expires 2/27/02
GW-89	Corona C.S.	Exprers 3/9/02
GW-95	Laguna C.S.	Expires 3/9/02
GW-109	Carlsbad C.S.	Expires 5/18/02
GW-110	Mountainair C.S.	Expires 5/18/02
GW-113	Eunice C.S.	Expires 6/19/02
GW-283	Jal C.S.	Expires 6/24/02
GW-285	Bisti C.S.	Expires 9/24/02

As you know, if you get your renewal applications in 120 prior to the expiration date, the permit will not expire on the dates above, but will extend until all paperwork is done on my end.

We need to go out and look at all of these at some point in time, but I will get back with you to set up a schedule.

Take care and have a good Thanksgiving.

Ed

Sent 11/16/01

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Dat

July 16, *1997*

THE NEW MEXICAN
202 E. Marcy
Santa Fe, New Mexico 87501

RE: NOTICE OF PUBLICATION

PO #96-199-002997

ATTN: Betsy Perner

Dear Sir/Madam:

Please publish the attached notice one time immediately on receipt of this request. Please proofread carefully, as any error in a land description or in a key word or phrase can invalidate the entire notice.

Immediately upon completion of publication, please send the following to this office:

1. *Publisher's affidavit.*
2. *Invoices for prompt payment.*

We should have these immediately after publication in order that the legal notice will be available for the hearing which it advertises, and also so that there will be no delay in your receiving payment.

Please publish the notice on Monday, July 20, *1997.*

Sincerely,

Sally E. Martinez
Administrative Secretary

Attachment

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

July 16, *1997*

LOVINGTON DAILY LEADER
P. O. Box 1717
Lovington, New Mexico 88260

ATTN: ADVERTISING MANAGER

RE: NOTICE OF PUBLICATION

Dear Sir/Madam:

Please publish the attached notice one time immediately on receipt of this request. Please proofread carefully, as any error in a land description or in a key word or phrase can invalidate the entire notice.

Immediately upon completion of publication, please send the following to this office:

1. ***Publisher's affidavit in duplicate.***
2. ***Statement of cost (also in duplicate.)***
3. ***CERTIFIED invoices for prompt payment.***

We should have these immediately after publication in order that the legal notice will be available for the hearing which it advertises, and also so that there will be no delay in your receiving payment.

Please publish the notice no later than July 23, *1997.*

Sincerely,

Sally E. Martinez
Administrative Secretary

Attachment

PS Form **3800**, April 1995

P 329 631 522

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

Sent to
Lovington Daily Leader
Street & Number
P.O. Box 1717
Post Office, State, & ZIP Code
Lovington, NM 88260

Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date	

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

July 16, 1997

GRANTS BEACON
300 N. Second
Grants, New Mexico 87020

ATTN: ADVERTISING MANAGER

RE: NOTICE OF PUBLICATION

Dear Sir/Madam:

Please publish the attached notice one time immediately on receipt of this request. Please proofread carefully, as any error in a land description or in a key word or phrase can invalidate the entire notice.

Immediately upon completion of publication, please send the following to this office:

1. ***Publisher's affidavit in duplicate.***
2. ***Statement of cost (also in duplicate.)***
3. ***CERTIFIED invoices for prompt payment.***

We should have these immediately after publication in order that the legal notice will be available for the hearing which it advertises, and also so that there will be no delay in your receiving payment.

Please publish the notice no later than July 23, 1997.

Sincerely,

Sally Martinez

Sally E. Martinez
Administrative Secretary

Attachment

P 329 631 524

US Postal Service
Receipt for Certified Mail
No Insurance Coverage Provided.
Do not use for International Mail (See reverse)

Sent to	Grants Beacon
Street & Number	300 N. Second
Post Office, State, & ZIP Code	Grants NM
Postage	$ .80¢
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	$
Postmark or Date	

PS Form **3800**, April 1995

NOTICE OF PUBLICATION

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

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

(GW-095) - Transwestern Pipeline Company, Mr. James R. Russell, (505)-260-4011, Summit Office Bld. Ste 250, 4001 Indian School Rd. NE, Albuquerque, NM, 87110, has submitted a Discharge Plan Renewal Application for their Laguna Compressor Station located in the SE/4 of Section 7, and the NE/4 of Section 18, Township 9 North, Range 5 West, NMPM, Cibola County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 25 feet with a total dissolved solids concentration of approximately 335 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-113) - Transwestern Pipeline Company, Mr. James R. Russell, (505)-260-4011, Summit Office Bld. Ste 250, 4001 Indian School Rd. NE, Albuquerque, NM, 87110, has submitted a Discharge Plan Renewal Application for their Eunice Compressor Station located in the NW/4 of Section 27, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 50 feet with a total dissolved solids concentration of approximately 1500 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 11th day of July, 1997.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

WILLIAM J. LEMAY, Director

WJL/pws

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 7/2/97,

or cash received on _____ in the amount of $ 690.00

from Enron

for Eunice C.S GW-113

(Facility Name) (DP No.)

Submitted by: _____ Date: _____

Submitted to ASD by: R Chandler Date: 7/31/97

Received in ASD by: _____ Date: _____

Filing Fee ___ New Facility ___ Renewal X

Modification ___ Other _____

(specify)

Organization Code 521.07 Applicable FY 98

To be deposited in the Water Quality Management Fund.

Full Payment X or Annual Increment ___

ENRON CORP

P. O. Box 1188
Houston, TX 77251-1188

62-20
311

CHECK NO. [redacted]

CHECK DATE 07/07/97

PAY EXACTLY Six hundred ninety dollars and no/100----- DOLLARS

THIS CHECK IS VOID UNLESS PRINTED ON BLUE BACKGROUND

$ 690.00

NOT VALID AFTER 90 DAYS

PAY TO THE ORDER OF New Mexico Oil Conservation Divison
2040 South Pacheco
Santa Fe, New Mexico 87505

NOT VALID OVER $5000.00 UNLESS COUNTERSIGNED

FIELD DISBURSEMENT ACCOUNT

CITIBANK DELAWARE

[redacted]

Enron Corp.
P. O. Box 1188
Houston, TX 77251-1188

ENRON CORP

CHECK NO. [redacted]

CHECK DATE 07/07/97

PAGE OF

VENDOR NO:
REMITTANCE STATEMENT

VOUCHER NO.	INVOICE DATE	INVOICE NO.	PURCHASE ORDER	AMOUNT		
				GROSS	DISCOUNT	NET
Eunice Compressor Station - Ground Water Discharge Renewal Fee						690.00
					TOTAL	$690.00

SPECIAL INSTRUCTIONS:

DETACH AND RETAIN THIS STUB FOR YOUR RECORDS.

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 6/25/97,

or cash received on _____ in the amount of $ 50.00

from ENRON

for Eunice C.S. GW-113

(Facility Name) (DP No.)

Submitted by: _____ Date: _____

Submitted to ASD by: R. C. Anderson Date: 7/31/97

Received in ASD by: _____ Date: _____

Filing Fee X New Facility ____ Renewal ____

Modification ____ Other _____

(specify)

Organization Code 521.07 Applicable FY 98

To be deposited in the Water Quality Management Fund.

Full Payment ____ or Annual Increment ____

ENRON CORP

P. O. Box 1188
Houston, TX 77251-1188

62-20
311

CHECK NO. [redacted]

CHECK DATE 06/25/97

PAY EXACTLY Fifty dollars and no/100 DOLLARS

THIS CHECK IS VOID UNLESS PRINTED ON BLUE BACKGROUND

$ 50.00

NOT VALID AFTER 90 DAYS

Anne E Bailey

PAY TO THE ORDER OF
New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fee, New Mexico 87505

NOT VALID OVER $5000.00 UNLESS COUNTERSIGNED

FIELD DISBURSEMENT ACCOUNT

CITIBANK DELAWARE

[redacted]

Enron Corp.
P. O. Box 1188
Houston, TX 77251-1188

ENRON CORP

CHECK NO. [redacted]

CHECK DATE 06/25/97

PAGE OF

VENDOR NO:
REMITTANCE STATEMENT

VOUCHER NO.	INVOICE DATE	INVOICE NO.	PURCHASE ORDER	AMOUNT		
				GROSS	DISCOUNT	NET
Eunice Compressor Station - Ground Water Discharge renewal fee.						50.00
					TOTAL	50.00

SPECIAL INSTRUCTIONS:

DETACH AND RETAIN THIS STUB FOR YOUR RECORDS.

Affidavit of Publication

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

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

That the notice which is hereto attached, entitled

Legal Notice

Notice Of Publication

and numbered ....

.... was published in a regular and entire issue of THE LOVINGTON DAILY LEADER and not in any supplement thereof, ...

...., for one (1) day

consecutive weeks, beginning with the issue of

July 23, 1997

and ending with the issue of

July 23, 1997

And that the cost of publishing said notice is the sum of $ 63.20

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

Joyce Clemens

Subscribed and sworn to before me this 23rd day of July, 1997

Jean Henson

Notary Public, Lea County, New Mexico

My Commission Expires Sept. 28, 1998

Okay
DNG
7-29-97

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

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

(GW-095) - Transwestern Pipeline Company, Mr. James R. Russell, (505)-260-4011, Summit Office Bld. Ste 250, 4001 Indian School Rd. NE, Albuquerque, NM, 87110, has submitted a Discharge Plan Renewal Application for their Laguna Compressor Station located in the SE/4 of Section 7, and the NE/4 of Section 18, Township 9 North, Range 5 West, NMPM, Cibola County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 25 feet with a total dissolved solids concentration of approximately 335 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 11th day of July, 1997.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
WILLIAM J. LEMAY,
Director

SEAL

Published in the Lovington Daily Leader July 22, 1997.

The Santa Fe New Mexican

Since 1849. We Read You.

NM OIL DIVISION

AD NUMBER: 668190 ACCOUNT: 56689

LEGAL NO: 62063 P.O. #: 96-199-002997

215 LINES ONCE at $ 86.00

Affidavits: 5.25

Tax: 5.70

Total: $ 96.95

Okay PWB

7-28-97

RECEIVED

JUL 28 1997

Environmental Bureau
Oil Conservation Division

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, BETSY PERNER being first duly sworn declare and say that I am Legal Advertising Representative of THE SANTA FE NEW MEXICAN, a daily news paper published in the English language, and having a general circulation in the Counties of Santa Fe and Los Alamos, State of New Mexico and being a Newspaper duly qualified to publish legal notices and advertisements under the provisions of Chapter 167 on Session Laws of 1937; that the publication # 62063 a copy of which is hereto attached was published in said newspaper once each WEEK for ONE consecutive week(s) and that the notice was published in the newspaper proper and not in any supplement; the first publication being on the 21 day of JULY 1997 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/ Betsy Perner
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this
21 day of JULY A.D., 1997

Notary Laura R. Harding
Commission Expires 11/23/99

NOTICE OF PUBLICATION

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

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(GW-111) - Transwestern Pipeline Company, Mr. James R. Russell, (505)-260-4011, Summit Office Bld. Ste 250, 4001 Indian School Rd. NE, Albuquerque, NM, 87110, has submitted a Discharge Plan Renewal Application for their Eunice Compressor Station located in the NW/4 of Section 27, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most likely to be affect by a spill, leak, or accidental discharge to the surface is at a depth of approximately 50 feet with a total dissolved solids concentration of approximately 1500 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 11th day of July 1997.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
WILLIAM J. LEMAY,
Director
Legal #62063
Pub. July 21, 1997

NOTICE OF PUBLICATION

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

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

(GW-095) - Transwestern Pipeline Company, Mr. James R. Russell, (505)-260-4011, Summit Office Bld. Ste 250, 4001 Indian School Rd. NE, Albuquerque, NM, 87110, has submitted a Discharge Plan Renewal Application for their Laguna Compressor Station located in the SE/4 of Section 7, and the NE/4 of Section 18, Township 9 North, Range 5 West, NMPM, Cibola County, New Mexico. Any potential discharge at the facility will be stored in a closed top receptacle. Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 25 feet with a total dissolved solids concentration of approximately 335 mg/L. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 11th day of July, 1997.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

WILLIAM J. LEMAY, Director

WJL/pws

Services provided by Northern Natural Gas Company and Transwestern Pipeline Company

SOUTHWEST REGION
Summit Office Building, Suite 250
4001 Indian School Road, N.E.
Albuquerque, New Mexico 87110

Phone: (505) 260-4000
Fax: (505) 254-1437

To: PAT

Fax Number: _____

Date: _____

From:

___ Arnie Bailey
___ Bob Bandel
___ Tom Carlson
___ Terry Ervin
___ Jon Hendricks
___ Carmelita Holland
___ Trevor Davidson
___ Todd Ingalls
___ Rich Jolly
___ Tim Jones
___ Joe Lueras
___ Ronnie Morse
✓ James (Butch) Russell
___ Kathy Santerre
___ Rick Smith

Comments:

_____

_____

_____

_____

Number of pages including this cover sheet: 2

Please call (505) 260- 4011 if you do not receive the following transmission in its entirety.

Mr. Pat Sanchez

The address for Quell is as following

Quell Petroleum
2503 South Stockton Street
Monahans Texas 79756
Phone 915 943-8400

Contact Person is Gladys Thomas

Address for Sta 6 is
S E QUARTER OF SEC. 7
N E QUARTER OF SEC 18
T 9N
R 5W
CIBOLA COUNTY NEW MEXICO

ADDRESS FOR EUNICE COMPRESSOR STATION
N W QUARTER OF SEC. 27
T 22 S
R 37 E
LEA COUNTY

Transwestern Pipeline Company

4001 Indian School Road, Northeast, Suite 250 Albuquerque, New Mexico 87110 (505) 260-4000 Fax (505) 254-1437

June 23,1997

Mr. Pat Sanchez
New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fe, New Mexico 87505

James R. Russell
Enron Transportation & Storage
Summit Office Bld. Ste. 250
4001 Indian School Rd. NE
Albuquerque, New Mexico 87110

Re: Renewal of Discharge Plan GW-113, Eunice Compressor Station

Dear Mr. Pat Sanchez:

Enron Transportation & Storage, operator of the Eunice Compressor Station, in reply to your phone conversation, requesting renewal of the above reference discharge plan. By this letter and the attached application, Enron Transportation and Storage request renewal of the discharge plan for the Eunice Compressor Station. Under the original application submitted on April 21, 1992, Enron provided all necessary and accurate information and was issued GW-113 by the Oil Conservation Division.

1. Type: Compressor Station

2. Operator of facility is Enron Transportation and Storage
P.O.Box 70 Eunice New Mexico 88231
Contact Person is Greg Moya
Phone # (505) 394-3116

3. Location is North West Quarter of Sec 27 Township 225 Range 37E

During the five (5) years operating period of this approved plan, the activities at the facility which are covered under this plan have remained consistent.

As required under 3-114 of the Water Quality Control Regulation, enclosed find two checks in the amount of $50.00 (0602520764) and $690.00 (06025207770) for the nonrefundable filing fee and flat fee, respectively, for this renewal application.

If you should require any additional information concerning this application, contact our Albuquerque Technical Operations at (505) 260-4011.

Sincerely,

James R. Russell
Environmental Specialist

xc: Rich Jolly
Larry Campbell
Kermit Team
file

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

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

RECEIVED
JUL 9 1997
Environmental Bureau
Oil Conservation Division

Revised 12/1/9

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

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

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

☐ New ☒ Renewal ☐ Modification

1. Type: COMPRESSOR STATION
2. Operator: ENRON TRANSPORTATION & STORAGE

   Address: EUNICE,NEW MEXICO P.O.BOX 70

   Contact Person: GREG MOYA Phone: (505) 394-3116
3. Location: NW quarter/4 of SEC 27 /4 Section 27 Township 22S Range 37E

   Submit large scale topographic map showing exact location.
4. Attach the name, telephone number and address of the landowner of the facility site.
5. Attach the description of the facility with a diagram indicating location of fences, pits, dikes and tanks on the facility.
6. Attach a description of all materials stored or used at the facility.
7. Attach a description of present sources of effluent and waste solids. Average quality and daily volume of waste water must be included.
8. Attach a description of current liquid and solid waste collection/treatment/disposal procedures.
9. Attach a description of proposed modifications to existing collection/treatment/disposal systems.
10. Attach a routine inspection and maintenance plan to ensure permit compliance.
11. Attach a contingency plan for reporting and clean-up of spills or releases.
12. Attach geological/hydrological information for the facility. Depth to and quality of ground water must be included.
13. Attach a facility closure plan, and other information as is necessary to demonstrate compliance with any other OCD rules, regulations and/or orders.
14. CERTIFICATION

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

NAME: JAMES R. RUSSELL Title: ENVIRONMENTAL SPEC.

Signature: James R. Russell Date: 6-24-97

Enron Corp.
P. O. Box 1188
Houston, TX 77251-1188

ENRON CORP

CHECK NO. [redacted]

CHECK DATE 06/25/97

PAGE OF

VENDOR NO:
REMITTANCE STATEMENT

VOUCHER NO.	INVOICE DATE	INVOICE NO.	PURCHASE ORDER	AMOUNT		
				GROSS	DISCOUNT	NET
Eunice Compressor Station - Ground Water Discharge renewal fee.						50.00
					TOTAL	50.00

SPECIAL INSTRUCTIONS:

DETACH AND RETAIN THIS STUB FOR YOUR RECORDS.

ENRON CORP

P. O. Box 1188
Houston, TX 77251-1188

62-20
311

CHECK NO. [redacted]

CHECK DATE 06/25/97

PAY EXACTLY Fifty dollars and no/100 DOLLARS

THIS CHECK IS VOID UNLESS PRINTED ON BLUE BACKGROUND

$ 50.00

NOT VALID AFTER 90 DAYS

PAY TO THE ORDER OF
New Mexico Oil Conservation Division
2040 South Pacheco
Santa Fee, New Mexico 87505

NOT VALID OVER $5000.00 UNLESS COUNTERSIGNED

FIELD DISBURSEMENT ACCOUNT

CITIBANK DELAWARE

[redacted]

Enron Corp.
P. O. Box 1188
Houston, TX 77251-1188

ENRON CORP

CHECK NO. [redacted]

CHECK DATE 07/07/97

PAGE OF

VENDOR NO:
REMITTANCE STATEMENT

VOUCHER NO.	INVOICE DATE	INVOICE NO.	PURCHASE ORDER	AMOUNT		
				GROSS	DISCOUNT	NET
Eunice Compressor Station - Ground Water Discharge Renewal Fee						690.00
					TOTAL	$690.00

SPECIAL INSTRUCTIONS:

DETACH AND RETAIN THIS STUB FOR YOUR RECORDS.

ENRON CORP

P. O. Box 1188
Houston, TX 77251-1188

62-20
311

CHECK NO. [redacted]

CHECK DATE 07/07/97

PAY EXACTLY Six hundred ninety dollars and no/100----- DOLLARS

THIS CHECK IS VOID UNLESS PRINTED ON BLUE BACKGROUND

$ 690.00

NOT VALID AFTER 90 DAYS

PAY TO THE ORDER OF
New Mexico Oil Conservation Divison
2040 South Pacheco
Santa Fe, New Mexico 87505

NOT VALID OVER $5000.00 UNLESS COUNTERSIGNED

FIELD DISBURSEMENT ACCOUNT

CITIBANK DELAWARE

[redacted]

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

CERT. MAIL NO. P-326-936-630

☒ Telephone ☐ Personal	Time 3:30 PM	Date 7/1/97

Originating Party	Other Parties
Pat Sanchez - OCD	Butch Russell - TWPC

Subject GW-113 (Eunice Compressor) and GW-95 (Laguna) Discharge Plan Renewal applications.

Discussion Called Mr. Russell and let him know that his flat fee checks should have been: GW-113 = $690 (six-hundred And Ninety Dollars) GW-095 = $690 (six-hundred And Ninety Dollars) instead of the $1,380 that TWPC sent for each facility.

Conclusions or Agreements OCD will return applications And checks to TWPC (Mr. Russell). TWPC will resubmit the correct fees and New permit application letters showing the corrections.

Distribution File (GW-113, GW-095)
Mr. Butch Russell - TWPC

Signed Patricia W. Sanchez

FAX (505) 625-8060

Phone (505) 623-2761

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

January 17,1997

23

Mr. Pat Sanchez
Oil Conservation Division
2048 Pacheco St.
Santa Fe, New Mexico 87502

Re: Land Ownership Status, Transwestern Pipeline Company Facilities

Dear Mr. Sanchez:

As per your request in January of this year, presented below are the land ownership designations for those Transwestern facilities which are covered under the Oil Conservation Division's (OCD) groundwater discharge plans:

Facility	Discharge Plan No.	Ownership
C/S No. 5, Thoreau	GW- 80	Transwestern
Bloomfield C/S	GW- 84	Transwestern
C/S No. 6, Laguna	GW- 95	Luguna Reservation
C/S No. 7, Mountainair	GW-110	Transwestern
C/S No. 8, Corona	GW- 89	Transwestern
C/S No. 9, Roswell	GW- 52	Transwestern
Portales (P-1) C/S	GW- 90	Transwestern
Carlsbad (Wt-1) C/S	GW-109	Transwestern
Monument Turbine C/S	GW-197	Transwestern
Eunice C/S	GW-113	Transwestern

Should you require additional information concerning the above listed facilities, contact the undersigned at our Roswell Technical Operations office at (505) 625-8022.

Sincerely,

Larry Campbell
Division Environmental Specialist

file

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 9/7/95

or cash received on 9/11/95 in the amount of $ 740.00

from Transwestern Pipeline Co

for Eunice Compressor Station (Facility Name) GW-113 (OP No.)

Submitted by: _____ Date: _____

Submitted to ASD by: Roger Anderson Date: 9/13/95

Received in ASD by: Angie Allre Date: 9/13/95

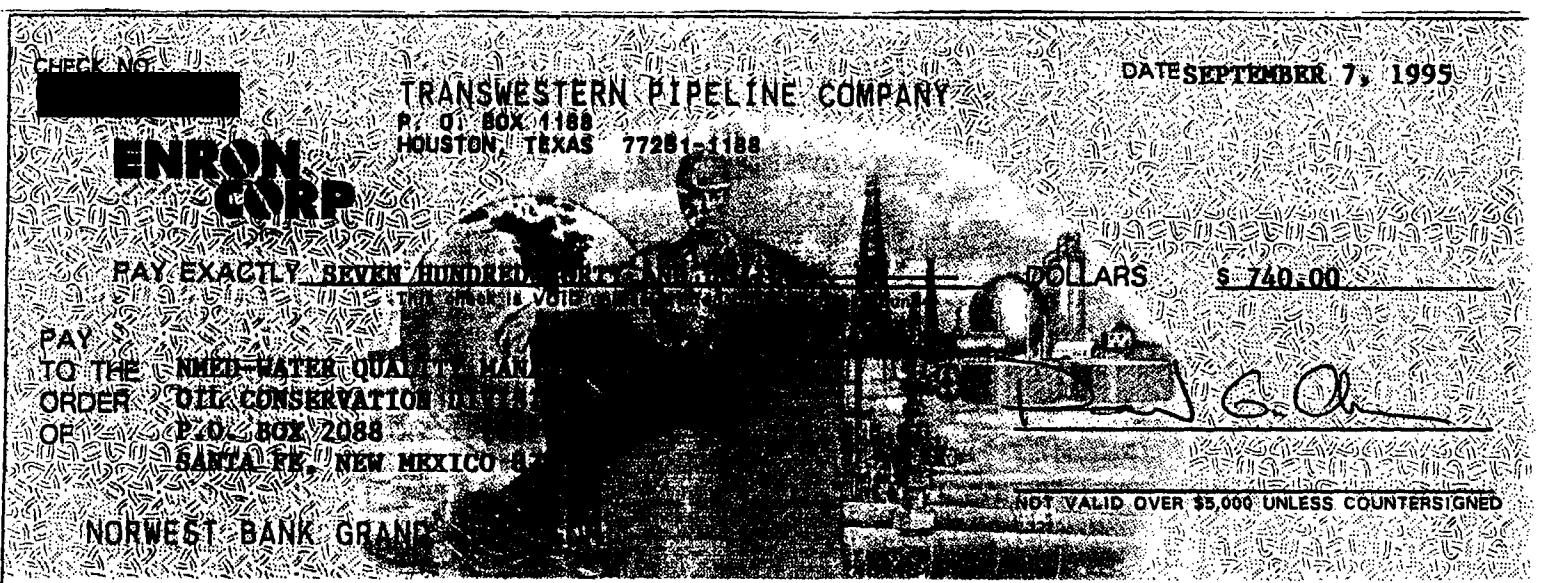
Filing Fee X New Facility ___ Renewal ___

Modification X Other _____ (specify)

Organization Code 5210.07 Applicable FY 96

To be deposited in the Water Quality Management Fund.

Full Payment X or Annual Increment ___


CHECK NO. [redacted]

TRANSWESTERN PIPELINE COMPANY
P. O. BOX 1188
HOUSTON, TEXAS 77251-1188

DATE SEPTEMBER 7, 1995

ENRON CORP

PAY EXACTLY SEVEN HUNDRED [illegible] DOLLARS $ 740.00

THIS CHECK IS VOID [illegible]

PAY TO THE ORDER OF
WATER QUALITY MAN
OIL CONSERVATION
P.O. BOX 2088
SANTA FE, NEW MEXICO

NOT VALID OVER $5,000 UNLESS COUNTERSIGNED

NORWEST BANK GRAND [illegible]

[redacted]

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

WE NEVER did pay this

June 21, 1993

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

CERTIFIED MAIL
RETURN RECEIPT NO.P-111-334-215

CARMEN, WE NEED A check for

Please note that Section 3-104 of the regulations requires that "When a plan has been approved, discharges must be consistent with the 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.

The discharge plan modification application for the Transwestern Pipeline Company Eunice Compressor Station is subject to the WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan modification will be assessed a fee equal to the filing fee of fifty (50) dollars plus the flat rate fee of six-hundred ninety (690) dollars for compressor stations in excess of 3000 horsepower.

The OCD has **not** received your $50 filing fee and is due upon receipt of this letter. The flat rate fee may be paid in a single payment due at the time of approval, or in equal installments over the duration of the plan, with the first payment due upon receipt of this letter.

Please make all checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office.

On behalf of the staff of the Oil Conservation Division, I wish to thank you and your staff for your cooperation.

Sincerely,

William J. LeMay
Director

WJL/cee

xc: OCD Aztec Office

MEMORANDUM OF MEETING OR CONVERSATION

X TELEPHONE ___ PERSONAL TIME 8:25 (AM) PM DATE 8/31/95

ORIGINATING PARTY: Pat Sanchez - OCD
OTHER PARTIES: LARRY CAMPBELL - ENRON

SUBJECT: "Eunice" CDP GW-113

DISCUSSION: Have not received the modification fees for June 21, 1993 - Land farm.

AMOUNT: Filing Fee = 50 $
Flat Fee = 690 $

Larry said they have 4 - 1200 HP units.

CONCLUSIONS/AGREEMENTS: Larry said he would get a check to us in the mail today
50 $ filing & 690 $ Flat Fees

PATRICIO W. SANCHEZ: Patricio W. Sanchez

xc: FILE, RCA

cc: BILL OLSON
PAL SANCHEZ
JERRY SEXTON
A.P

OIL CONSERVATION DIVISION
RECEIVED

'95 AUG 24 AM 8 52

NEW MEXICO OIL CONSERVATION COMMISSION
FIELD TRIP REPORT

INSPECTION	CLASSIFICATION	FACILITY	HOURS	QUARTER HOURS

Name WAYNE PRICE Date 8-16-95 Miles _____ District I

Time of Departure 7 AM Time of Return 4 PM Car No. G C

In the space below indicate the purpose of the trip and the duties performed, listing wells or leases visited and any action taken.

Signature

NNG EUNICE COMP. ST GW-113

GEORGE ROBINSON SAFETY STAFF - CYPRESS CONST.

WITNESSED SAMPLING MW'S & WATER LEVELS

NOTE: PSH ≈ 1-1.5' FOUND IN MW-3

APPEARS LIGHT CRUDE OR CONDENSATE -

SPLIT SAMPLE AT MW-2 - RAN FIELD BTEX (PID)

= 278 ppm STRONG HYDROCARBON ODOR, COLOR YELLOW

MAP ATTACHED

Mileage	Per Diem	Hours
UIC _____	UIC _____	UIC _____
RFA _____	RFA _____	RFA _____
Other _____	Other _____	Other _____

TYPE INSPECTION PERFORMED

H = Housekeeping
P = Plugging
C = Plugging Cleanup
T = Well Test
R = Repair/Workover
F = Waterflow
M = Mishap or Spill
W = Water Contamination
O = Other

INSPECTION CLASSIFICATION

U = Underground Injection Control - Any inspection of or related to injection project, facility, or well or resulting from injection into any well. (SWD, 2ndry injection and production wells, water flows or pressure tests, surface injection equipment, plugging, etc.)

R = Inspections relating to Reclamation Fund Activity

O = Other - Inspections not related to injection or The Reclamation Fund

E = Indicates some form of enforcement action taken in the field (show immediately below the letter U, R or O)

NATURE OF SPECIFIC WELL OR FACILITY INSPECTED

D = Drilling
P = Production
I = Injection
C = Combined prod. inj operations
S = SWD
U = Underground Storag
G = General Operation
F = Facility or locati
M = Meeting
O = Other

T/4215/421506C

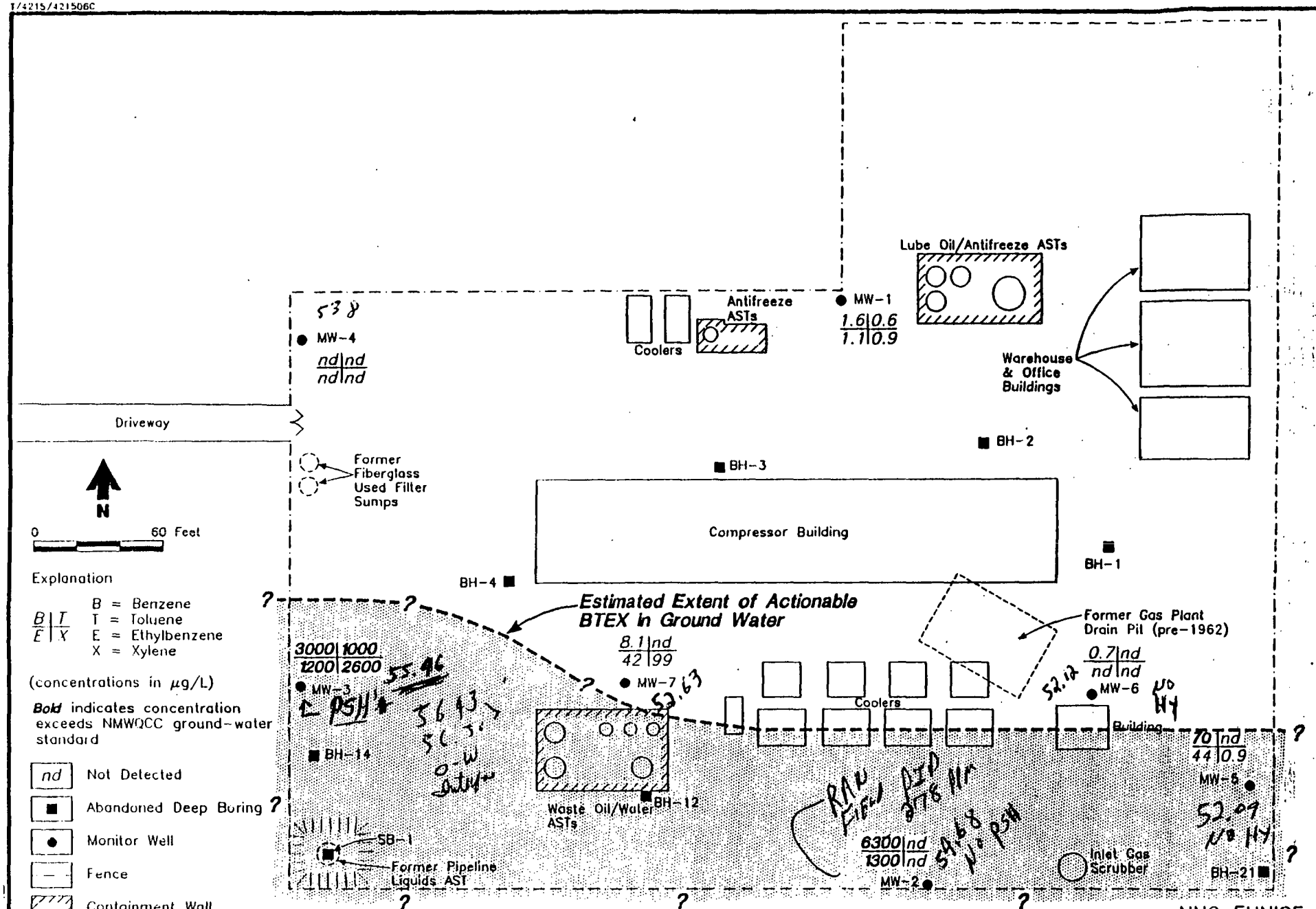


Figure 6

NNG EUNICE

Estimated Extent of Actionable BTEX in Ground Water, October 1994

DANIEL B. STEPHENS & ASSOCIATES, INC.
12-94 JN 4215

TWP - EUNICE GREG MOYA (505) 394-3116

5 mi SOUTH OF EUNICE ON LOOP 207 — USE UPS OR FED EX
EUNICE, NM 88231 — (ON LEFT)
SIGN: ENRON NORTHERN NATURAL EUNICE PLANT
(RIGHT NEXT DOOR TO TEXACO PLANT)

TWP
P.O. BOX 70
EUNICE, NM 88231

HAVE 2 DRUMS ON HAND ✓

LOCKS ON SOME ± 3 (DOES HAVE KEYS TO LOCKS)

MW-1
TD = 60'
SCREEN 50-60'
H2O TABLE 53'
WELL CAP 2" PVC

MW-2
TD = 59.0'
SCREEN = 49.0'-59.0'
H2O TBL = 51.9'
WELL CAP = 2" PVC

MW-3
TD = 65' BLS
SCREEN = 50-60' BLS
H2O TBL = 52' BLS
WELL CAP = 2" PVC

MW-4
TD = 67'
SCREEN = 49-64'
H2O TBL = 53.6'
2" PVC

MW-5
TD = 67'
SCREEN = 48-63'
H2O TBL = 51.8'
2" PVC

MW-6
TD = [illegible]70'
SCREEN = 45-60'
H2O TBL = 51.9'
2" PVC

MW-7
TD = 67'
SCREEN = 48-63'
2" PVC
H2O TBL = 52.5'

* NET WILL SEND TO OUR OFFICE TOMORROW MORNING (8/11)

ENRON
OPERATIONS CORP.

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

September 7, 1995

Mr. William C. Olson
Environmental Bureau
New Mexico Oil Conservation Division
2040 S. Pacheco St.
Santa Fe, New Mexico 87505

RECEIVED
SEP 13 1995
Environmental Bureau
Oil Conservation Division

RE: Final Disposition of Investigation Derived Wastes
Northern Natural Gas Company Eunice Compressor Station
Lea County, New Mexico

Dear Bill,

In the course of the third quarter 1995 ground water sampling event at the subject facility, approximately 36 gallons of potentially contaminated water was collected from six on-site ground water monitor wells. This water is currently stored in two drums at the site. The source, quantity, and proposed disposition of water in each drum is summarized below in Table 1. The proposed disposition is based on laboratory analysis of ground water samples from each monitor well. A summary of the laboratory analysis and a copy of the analytical results are attached.

Table 1. Source, Quantity, and Proposed Disposition of Investigation Derived Waste Water

Source	Quantity (gallons)	Proposed Disposition
MW-1 & MW-4	11	The only detected compound in samples collected from these two wells was chloroform (0.0372 mg/L). Since the concentration is below the NMWQCC standard (0.100 mg/L) and because the detection most likely represents a laboratory artifact, the proposed disposition is to dispose of the water on the ground surface at the site.
MW-2, MW-5, MW-6, MW-7, & decon water	25	This water contains a concentration of benzene greater than 0.500 mg/L, however, because the source of the benzene in ground water has been determined to originate from the adjoining gas plant, the water is exempt from RCRA regulation. Therefore, the proposed disposition is to place the water into the on-site condensate AST.
Total	36	

Verbal approval on 9/27/95 to George Robinson
Bill Olson

Transwestern Pipeline Company, as operator of the subject facility, will implement the proposed disposition of investigation derived wastes upon review and approval by your office.

If you have any questions regarding this proposal, please contact me at (713) 646-7644 or George Robinson at (713) 646-7327.

Sincerely,

Bill Kendrick

Bill Kendrick
EOC Environmental Affairs
Manager, Projects Group

gcr/BK

NATIONAL ENVIRONMENTAL TESTING, INC.

Dallas Division
1548 Valwood Parkway
Suite 118
Carrollton, TX 75006
Tel: (214) 406-8100
Fax: (214) 484-2969

ANALYTICAL AND QUALITY CONTROL REPORT

George Robinson
ENRON CORPORATION
Env. Affairs, Rm 3 AC 3142
P.O. Box 1188
Houston, TX 77251

09/01/1995

NET Job Number: 95.05645

Enclosed is the Analytical and Quality Control report for the following samples submitted to the Dallas Division of NET, Inc. for analysis. Reproduction of this analytical report is permitted only in its entirety.

Sample Number	Sample Description	Date Taken	Date Received
271628	MW-5	08/16/1995	08/18/1995
271629	MW-2	08/16/1995	08/18/1995
271630	MW-4	08/16/1995	08/18/1995
271631	MW-6	08/16/1995	08/18/1995
271632	MW-7	08/16/1995	08/18/1995
271633	MW-1	08/16/1995	08/18/1995

National Environmental Testing, Inc. certifies that the analytical results contained herein apply only to the specific samples analyzed.

Holding Times: All holding times were within method criteria.

Method Blanks: All method blanks were within quality control criteria.

Instrument calibration: All calibrations were within method quality control criteria.

Analysis Comments: No Unusual Comments

Gregory K. Horton
Project Coordinator

OCEAN GROUP

NATIONAL ENVIRONMENTAL TESTING, INC.

Dallas Division
1548 Valwood Parkway
Suite 118
Carrollton, TX 75006
Tel: (214) 406-8100
Fax: (214) 484-2969

ANALYTICAL AND QUALITY CONTROL REPORT

George Robinson
ENRON CORPORATION
Env. Affairs, Rm 3 AC 3142
P.O. Box 1188
Houston, TX 77251

09/01/1995

NET Job Number: 95.05645

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271630	MW-4	08/16/1995	08/18/1995
271631	MW-6	08/16/1995	08/18/1995
271632	MW-7	08/16/1995	08/18/1995
271633	MW-1	08/16/1995	08/18/1995

National Environmental Testing, Inc. certifies that the analytical results contained herein apply only to the specific samples analyzed.

Holding Times: All holding times were within method criteria.

Method Blanks: All method blanks were within quality control criteria.

Instrument calibration: All calibrations were within method quality control criteria.

Analysis Comments: No Unusual Comments

Gregory K. Horton
Project Coordinator

OCEAN GROUP

ANALYTICAL REPORT

George Robinson
ENRON CORPORATION
Env. Affairs, Rm 3 AC 3142
P.O. Box 1188
Houston, TX 77251

09/01/1995
Job No.: 95.05645

Project Name: 3RD QTR GROUNDWATER SAMPLING EVENT

Date Received: 08/18/1995

271628 MW-5
Taken: 08/16/1995 14:30

VOLATILES - 8010 AQUEOUS		
Bromobenzene	<1.0	ug/L
Bromodichloromethane	<1.0	ug/L
Bromoform	<2.0	ug/L
Bromomethane	<4.0	ug/L
Carbon Tetrachloride	<1.0	ug/L
Chlorobenzene	<1.0	ug/L
Chloroethane	<4.0	ug/L
Chloroform	<1.0	ug/L
Chloromethane	<4.0	ug/L
Dibromochloromethane	<1.0	ug/L
Dibromomethane	<1.0	ug/L
1,2-Dichlorobenzene	<1.0	ug/L
1,3-Dichlorobenzene	<1.0	ug/L
1,4-Dichlorobenzene	<1.0	ug/L
Dichlorodifluoromethane	<3.0	ug/L
1,1-Dichloroethane	<1.0	ug/L
1,2-Dichloroethane	<1.0	ug/L
1,1-Dichloroethene	<2.0	ug/L
trans-1,2-Dichloroethene	<1.0	ug/L
1,2-Dichloropropane	<1.0	ug/L
cis-1,3-Dichloropropene	<1.0	ug/L
trans-1,3-Dichloropropene	<1.0	ug/L
Methylene Chloride	<5.0	ug/L
1,1,1,2-Tetrachloroethane	<1.0	ug/L
1,1,2,2-Tetrachloroethane	<1.0	ug/L
Tetrachloroethene	<1.0	ug/L
1,1,1-Trichloroethane	<1.0	ug/L
1,1,2-Trichloroethane	<1.0	ug/L
Trichloroethene	<1.0	ug/L
Trichlorofluoromethane	<4.0	ug/L
Trichloropropane	<1.0	ug/L

ANALYTICAL REPORT

George Robinson
ENRON CORPORATION
Env. Affairs, Rm 3 AC 3142
P.O. Box 1188
Houston, TX 77251

09/01/1995
Job No.: 95.05645

Project Name: 3RD QTR GROUNDWATER SAMPLING EVENT

Date Received: 08/18/1995

271628 MW-5
Taken: 08/16/1995 14:30

Vinyl chloride	<3.0	ug/L
EPA 8020-AQ (Preserved)		
Benzene	140	ug/L
Ethylbenzene	38	ug/L
Toluene	<2	ug/L
Xylenes, Total	12	ug/L
MTBE	<2	ug/L
SURR: a,a,a-TFT	113	% Rec

271629 MW-2
Taken: 08/16/1995 14:20

VOLATILES - 8010 AQUEOUS		
Bromobenzene	<1.0	ug/L
Bromodichloromethane	<1.0	ug/L
Bromoform	<2.0	ug/L
Bromomethane	<4.0	ug/L
Carbon Tetrachloride	<1.0	ug/L
Chlorobenzene	<1.0	ug/L
Chloroethane	<4.0	ug/L
Chloroform	<1.0	ug/L
Chloromethane	<4.0	ug/L
Dibromochloromethane	<1.0	ug/L
Dibromomethane	<1.0	ug/L
1,2-Dichlorobenzene	<1.0	ug/L
1,3-Dichlorobenzene	<1.0	ug/L
1,4-Dichlorobenzene	<1.0	ug/L
Dichlorodifluoromethane	<3.0	ug/L
1,1-Dichloroethane	<1.0	ug/L
1,2-Dichloroethane	<1.0	ug/L
1,1-Dichloroethene	<2.0	ug/L
trans-1,2-Dichloroethene	<1.0	ug/L

ANALYTICAL REPORT

George Robinson
ENRON CORPORATION
Env. Affairs, Rm 3 AC 3142
P.O. Box 1188
Houston, TX 77251

09/01/1995
Job No.: 95.05645

Project Name: 3RD QTR GROUNDWATER SAMPLING EVENT

Date Received: 08/18/1995

271629 MW-2
Taken: 08/16/1995 14:20

1,2-Dichloropropane	<1.0		ug/L
cis-1,3-Dichloropropene	<1.0		ug/L
trans-1,3-Dichloropropene	<1.0		ug/L
Methylene Chloride	<5.0		ug/L
1,1,1,2-Tetrachloroethane	<1.0		ug/L
1,1,2,2-Tetrachloroethane	<1.0		ug/L
Tetrachloroethene	<1.0		ug/L
1,1,1-Trichloroethane	<1.0		ug/L
1,1,2-Trichloroethane	<1.0		ug/L
Trichloroethene	<1.0		ug/L
Trichlorofluoromethane	<4.0		ug/L
Trichloropropane	<1.0		ug/L
Vinyl chloride	<3.0		ug/L
EPA 8020-AQ (Preserved)			
Benzene	6100		ug/L
Ethylbenzene	1190		ug/L
Toluene	<20	EDL	ug/L
Xylenes, Total	20		ug/L
MTBE	<20	EDL	ug/L
SURR: a,a,a-TFT	123		% Rec

271630 MW-4
Taken: 08/16/1995 12:40

VOLATILES - 8010 AQUEOUS			
Bromobenzene	<1.0		ug/L
Bromodichloromethane	<1.0		ug/L
Bromoform	<2.0		ug/L
Bromomethane	<4.0		ug/L
Carbon Tetrachloride	<1.0		ug/L
Chlorobenzene	<1.0		ug/L
Chloroethane	<4.0		ug/L
Chloroform	37.2		ug/L

EDL - Elevated Detection Limit due to matrix interference.

ANALYTICAL REPORT

George Robinson
ENRON CORPORATION
Env. Affairs, Rm 3 AC 3142
P.O. Box 1188
Houston, TX 77251

09/01/1995
Job No.: 95.05645

Project Name: 3RD QTR GROUNDWATER SAMPLING EVENT

Date Received: 08/18/1995

271630 MW-4
Taken: 08/16/1995 12:40

Chloromethane	<4.0	ug/L
Dibromochloromethane	<1.0	ug/L
Dibromomethane	<1.0	ug/L
1,2-Dichlorobenzene	<1.0	ug/L
1,3-Dichlorobenzene	<1.0	ug/L
1,4-Dichlorobenzene	<1.0	ug/L
Dichlorodifluoromethane	<3.0	ug/L
1,1-Dichloroethane	<1.0	ug/L
1,2-Dichloroethane	<1.0	ug/L
1,1-Dichloroethene	<2.0	ug/L
trans-1,2-Dichloroethene	<1.0	ug/L
1,2-Dichloropropane	<1.0	ug/L
cis-1,3-Dichloropropene	<1.0	ug/L
trans-1,3-Dichloropropene	<1.0	ug/L
Methylene Chloride	<5.0	ug/L
1,1,1,2-Tetrachloroethane	<1.0	ug/L
1,1,2,2-Tetrachloroethane	<1.0	ug/L
Tetrachloroethene	<1.0	ug/L
1,1,1-Trichloroethane	<1.0	ug/L
1,1,2-Trichloroethane	<1.0	ug/L
Trichloroethene	<1.0	ug/L
Trichlorofluoromethane	<4.0	ug/L
Trichloropropane	<1.0	ug/L
Vinyl chloride	<3.0	ug/L
EPA 8020-AQ (Preserved)		
Benzene	<2	ug/L
Ethylbenzene	<2	ug/L
Toluene	<2	ug/L
Xylenes, Total	<2	ug/L
MTBE	<2	ug/L
SURR: a,a,a-TFT	95	% Rec

271631 MW-6
Taken: 08/16/1995 13:30

VOLATILES - 8010 AQUEOUS

ANALYTICAL REPORT

George Robinson
ENRON CORPORATION
Env. Affairs, Rm 3 AC 3142
P.O. Box 1188
Houston, TX 77251

09/01/1995
Job No.: 95.05645

Project Name: 3RD QTR GROUNDWATER SAMPLING EVENT

Date Received: 08/18/1995

271631 MW-6
Taken: 08/16/1995 13:30

Bromobenzene	<1.0	ug/L
Bromodichloromethane	<1.0	ug/L
Bromoform	<2.0	ug/L
Bromomethane	<4.0	ug/L
Carbon Tetrachloride	<1.0	ug/L
Chlorobenzene	<1.0	ug/L
Chloroethane	<4.0	ug/L
Chloroform	<1.0	ug/L
Chloromethane	<4.0	ug/L
Dibromochloromethane	<1.0	ug/L
Dibromomethane	<1.0	ug/L
1,2-Dichlorobenzene	<1.0	ug/L
1,3-Dichlorobenzene	<1.0	ug/L
1,4-Dichlorobenzene	<1.0	ug/L
Dichlorodifluoromethane	<3.0	ug/L
1,1-Dichloroethane	<1.0	ug/L
1,2-Dichloroethane	<1.0	ug/L
1,1-Dichloroethene	<2.0	ug/L
trans-1,2-Dichloroethene	<1.0	ug/L
1,2-Dichloropropane	<1.0	ug/L
cis-1,3-Dichloropropene	<1.0	ug/L
trans-1,3-Dichloropropene	<1.0	ug/L
Methylene Chloride	<5.0	ug/L
1,1,1,2-Tetrachloroethane	<1.0	ug/L
1,1,2,2-Tetrachloroethane	<1.0	ug/L
Tetrachloroethene	<1.0	ug/L
1,1,1-Trichloroethane	<1.0	ug/L
1,1,2-Trichloroethane	<1.0	ug/L
Trichloroethene	<1.0	ug/L
Trichlorofluoromethane	<4.0	ug/L
Trichloropropane	<1.0	ug/L
Vinyl chloride	<3.0	ug/L

ANALYTICAL REPORT

George Robinson
ENRON CORPORATION
Env. Affairs, Rm 3 AC 3142
P.O. Box 1188
Houston, TX 77251

09/01/1995
Job No.: 95.05645

Project Name: 3RD QTR GROUNDWATER SAMPLING EVENT

Date Received: 08/18/1995

271631 MW-6
Taken: 08/16/1995 13:30

EPA 8020-AQ (Preserved)		
Benzene	<2	ug/L
Ethylbenzene	<2	ug/L
Toluene	<2	ug/L
Xylenes, Total	<2	ug/L
MTBE	<2	ug/L
SURR: a,a,a-TFT	129	% Rec

271632 MW-7
Taken: 08/16/1995 13:40

VOLATILES - 8010 AQUEOUS		
Bromobenzene	<1.0	ug/L
Bromodichloromethane	<1.0	ug/L
Bromoform	<2.0	ug/L
Bromomethane	<4.0	ug/L
Carbon Tetrachloride	<1.0	ug/L
Chlorobenzene	<1.0	ug/L
Chloroethane	<4.0	ug/L
Chloroform	<1.0	ug/L
Chloromethane	<4.0	ug/L
Dibromochloromethane	<1.0	ug/L
Dibromomethane	<1.0	ug/L
1,2-Dichlorobenzene	<1.0	ug/L
1,3-Dichlorobenzene	<1.0	ug/L
1,4-Dichlorobenzene	<1.0	ug/L
Dichlorodifluoromethane	<3.0	ug/L
1,1-Dichloroethane	<1.0	ug/L
1,2-Dichloroethane	<1.0	ug/L
1,1-Dichloroethene	<2.0	ug/L
trans-1,2-Dichloroethene	<1.0	ug/L

ANALYTICAL REPORT

George Robinson
ENRON CORPORATION
Env. Affairs, Rm 3 AC 3142
P.O. Box 1188
Houston, TX 77251

09/01/1995
Job No.: 95.05645

Project Name: 3RD QTR GROUNDWATER SAMPLING EVENT

Date Received: 08/18/1995

271632 MW-7
Taken: 08/16/1995 13:40

1,2-Dichloropropane	<1.0	ug/L
cis-1,3-Dichloropropene	<1.0	ug/L
trans-1,3-Dichloropropene	<1.0	ug/L
Methylene Chloride	<5.0	ug/L
1,1,1,2-Tetrachloroethane	<1.0	ug/L
1,1,2,2-Tetrachloroethane	<1.0	ug/L
Tetrachloroethene	<1.0	ug/L
1,1,1-Trichloroethane	<1.0	ug/L
1,1,2-Trichloroethane	<1.0	ug/L
Trichloroethene	<1.0	ug/L
Trichlorofluoromethane	<4.0	ug/L
Trichloropropane	<1.0	ug/L
Vinyl chloride	<3.0	ug/L
EPA 8020-AQ (Preserved)		
Benzene	3	ug/L
Ethylbenzene	70	ug/L
Toluene	<2	ug/L
Xylenes, Total	10	ug/L
MTBE	<2	ug/L
SURR: a,a,a-TFT	106	% Rec

271633 MW-1
Taken: 08/16/1995 12:10

VOLATILES - 8010 AQUEOUS		
Bromobenzene	<1.0	ug/L
Bromodichloromethane	<1.0	ug/L
Bromoform	<2.0	ug/L
Bromomethane	<4.0	ug/L
Carbon Tetrachloride	<1.0	ug/L
Chlorobenzene	<1.0	ug/L
Chloroethane	<4.0	ug/L
Chloroform	<1.0	ug/L
Chloromethane	<4.0	ug/L

ANALYTICAL REPORT

George Robinson
ENRON CORPORATION
Env. Affairs, Rm 3 AC 3142
P.O. Box 1188
Houston, TX 77251

09/01/1995
Job No.: 95.05645

Project Name: 3RD QTR GROUNDWATER SAMPLING EVENT

Date Received: 08/18/1995

271633 MW-1
Taken: 08/16/1995 12:10

Dibromochloromethane	<1.0	ug/L
Dibromomethane	<1.0	ug/L
1,2-Dichlorobenzene	<1.0	ug/L
1,3-Dichlorobenzene	<1.0	ug/L
1,4-Dichlorobenzene	<1.0	ug/L
Dichlorodifluoromethane	<3.0	ug/L
1,1-Dichloroethane	<1.0	ug/L
1,2-Dichloroethane	<1.0	ug/L
1,1-Dichloroethene	<2.0	ug/L
trans-1,2-Dichloroethene	<1.0	ug/L
1,2-Dichloropropane	<1.0	ug/L
cis-1,3-Dichloropropene	<1.0	ug/L
trans-1,3-Dichloropropene	<1.0	ug/L
Methylene Chloride	<5.0	ug/L
1,1,1,2-Tetrachloroethane	<1.0	ug/L
1,1,2,2-Tetrachloroethane	<1.0	ug/L
Tetrachloroethene	<1.0	ug/L
1,1,1-Trichloroethane	<1.0	ug/L
1,1,2-Trichloroethane	<1.0	ug/L
Trichloroethene	<1.0	ug/L
Trichlorofluoromethane	<4.0	ug/L
Trichloropropane	<1.0	ug/L
Vinyl chloride	<3.0	ug/L
EPA 8020-AQ (Preserved)		
Benzene	<2	ug/L
Ethylbenzene	<2	ug/L
Toluene	<2	ug/L
Xylenes, Total	<2	ug/L
MTBE	<2	ug/L
SURR: a,a,a-TFT	77	% Rec

NET NATIONAL ENVIRONMENTAL TESTING, INC.

CHAIN OF CUSTODY RECORD

COMPANY NNG EUNICE PLANT
ADDRESS ~~P.O. BOX XXX~~ 5mi. SOUTH OF EUNICE ON Loop 207
PHONE (713)646-7327 FAX
PROJECT NAME/LOCATION 3RD QTR GROUNDWATER SAMPLING EVENT
PROJECT NUMBER
PROJECT MANAGER

GEORGE K. OBINSON
ROOM 3AC-3142
P.O. BOX 1188
REPORT TO: HOUSTON, TX 77251
INVOICE TO: SAME AS ABOVE
P.O. NO.
NET QUOTE NO.

SAMPLED BY
SANDY SHARP (PRINT NAME) SIGNATURE
GEORGE ROBINSON (PRINT NAME) SIGNATURE

DATE	TIME	SAMPLE ID/DESCRIPTION	MATRIX	GRAB	COMP	# and Type of Containers: HCl	NaOH	HNO_3	H_2SO_4	OTHER	ANALYSES: 8010	8020
8/16/95	1430	MW-5	A	X		2					✓	✓
8/16/95	1420	MW-2		X		2					✓	✓
8/16/95	1240	MW-4		X		2					✓	✓
8/16/95	1330	MW-6		X		2					✓	✓
8/16/95	1340	MW-7		X		2					✓	✓
8/16/95	1210	MW-1		X		3					✓	✓

To assist us in selecting the proper method
Is this work being conducted for regulatory compliance monitoring? Yes ___ No ___
Is this work being conducted for regulatory enforcement action? Yes ___ No ___
Which regulations apply: RCRA ___ NPDES Wastewater ___ UST ___ Drinking Water ___ Other ___ None ___

COMMENTS

DW 8/25

CONDITION OF SAMPLE: BOTTLES INTACT? YES / NO
FIELD FILTERED? YES / NO
COC SEALS PRESENT AND INTACT? YES / NO
VOLATILES FREE OF HEADSPACE? YES / NO
TEMPERATURE UPON RECEIPT: 4°C
Bottles supplied by NET? YES / NO

SAMPLE REMAINDER DISPOSAL: RETURN SAMPLE REMAINDER TO CLIENT VIA ___
I REQUEST NET TO DISPOSE OF ALL SAMPLE REMAINDERS ___ DATE ___

RELINQUISHED BY:	DATE	TIME	RECEIVED BY:	RELINQUISHED BY:	DATE	TIME	RECEIVED FOR NET BY:
Sandy Sharp	8/17/95	1600			8/18/95	10:00	R. DeWitt

METHOD OF SHIPMENT

REMARKS:

DW

PT 1 - ORIGINAL - WHITE PT 2 - NET PROJECT MANAGER - YELLOW PT 3 - CUSTOMER COPY - PINK

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

June 20, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. P-667-242-283

Mr. Larry Campbell
Transwestern Pipeline Company
Technical Operations
P.O. Box 1717
Roswell, New Mexico 88202-1717

RE: FINAL SOIL CLOSURE REPORT
TRANSWESTERN EUNICE COMPRESSOR STATION

Dear Mr. Campbell:

The New Mexico Oil Conservation Division (OCD) has completed a review of Transwestern Pipeline Company's (TPC) April 25, 1995 "FINAL CLOSURE REPORT FOR REMOVAL OF THE CONTAMINATED SOILS AT THE EUNICE COMPRESSOR STATION". This document contains the final results of removal actions for contaminated soil at the Eunice Compressor Station.

The above referenced closure report is approved.

Please be advised that OCD approval does not relieve TPC of liability if remaining contaminants pose a threat to surface water, ground water, human health or the environment. In addition, OCD approval does not relieve TPC of responsibility for compliance with any other federal, state or local laws and/or regulations.

If you have any questions, please contact me at (505) 827-7154.

Sincerely,

William C. Olson
Hydrogeologist
Environmental Bureau

xc: Jerry Sexton, OCD Hobbs District Supervisor
Wayne Price, OCD Hobbs Office

P 667 242 282

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PS Form **3800**, June 1990

Bill Olson

From: Jerry Sexton
Date sent: Tuesday, June 20, 1995 7:42AM
To: Bill Olson
Subject: Registered: Jerry Sexton

Your message
To: Jerry Sexton
Subject: ENRON Eunice Station
Date: Monday, June 19, 1995 4:30PM
was accessed on
Date: Tuesday, June 20, 1995 7:42AM

OIL CONSERVATION DIVISION
RECEIVED
95 AUG 8 AM 8 52

cc: BILL OLSON
PAL SANCHEZ
JERRY SEXTON
A.P

NEW MEXICO OIL CONSERVATION COMMISSION
FIELD TRIP REPORT

INSPECTION	CLASSIFICATION	FACILITY	HOURS	QUARTER HOURS

Name WAYNE PRICE Date 8-16-95 Miles _____ District I

Time of Departure 7 AM Time of Return 4 PM Car No. G C

In the space below indicate the purpose of the trip and the duties performed, listing wells or leases visited and any action taken.

Signature [signature]

NNG EUNICE COMP. ST GW-113

GEORGE ROBINSON SAMPLY SHARP - CYPRESS CONST.

WITNESSED SAMPLING MW'S & WATER LEVELS

NOTE: PSH ≈ 1-1.5' FOUND IN MW-3

APPEARS LIGHT CRUDE OR CONDENSATE -

SPLIT SAMPLE AT MW-2 - RAN FIELD BTEX (PID)

= 278 PPM STRONG HYDROCARBON ODOR, COLOR YELLOW

MAP ATTACHED

Mileage		Per Diem		Hours	
UIC		UIC		UIC	
RFA		RFA		RFA	
Other		Other		Other	

TYPE INSPECTION PERFORMED

H = Housekeeping
P = Plugging
C = Plugging Cleanup
T = Well Test
R = Repair/Workover
F = Waterflow
M = Mishap or Spill
W = Water Contamination
O = Other

INSPECTION CLASSIFICATION

U = Underground Injection Control - Any inspection of or related to injection project, facility, or well or resulting from injection into any well. (SWD, 2ndry injection and production wells, water flows or pressure tests, surface injection equipment, plugging, etc.)

R = Inspections relating to Reclamation Fund Activity

O = Other - Inspections not related to injection or the Reclamation Fund

E = Indicates some form of enforcement action taken in the field (show immediately below the letter U, R or O)

NATURE OF SPECIFIC WELL OR FACILITY INSPECTED

D = Drilling
P = Production
I = Injection
C = Combined prod. inj. operations
S = SWD
U = Underground Storage
G = General Operation
F = Facility or Location
M = Meeting
O = Other

T/4215/421506C

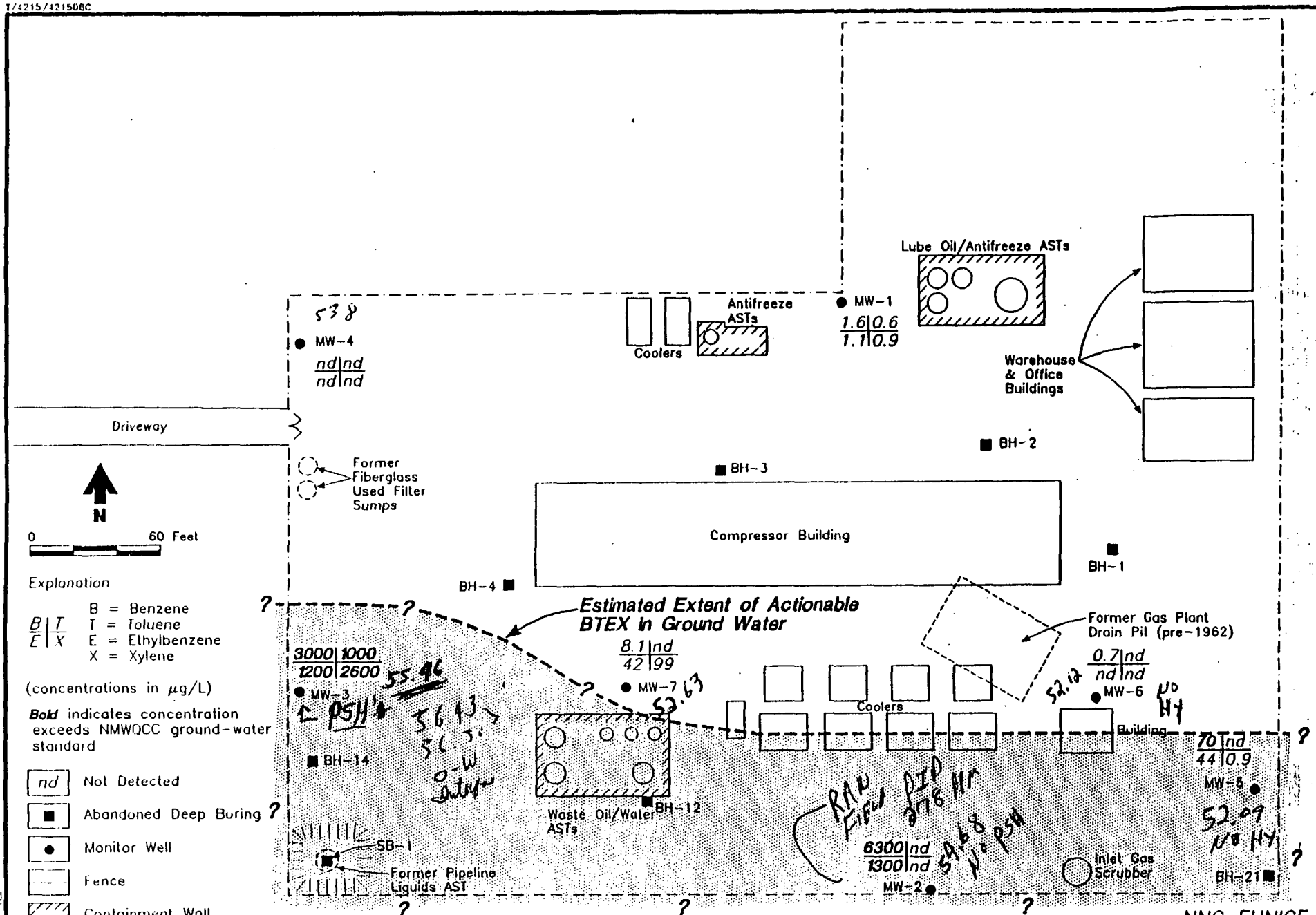

Figure 6

NNG EUNICE

Estimated Extent of Actionable BTEX in Ground Water, October 1994

DANIEL B. STEPHENS & ASSOCIATES, INC.
12-94 JN 4215

TWP - EUNICE GREG MOYA (505) 394-3116

* 5 mi SOUTH OF EUNICE ON LOOP 207 — ON (LEFT)
EUNICE, NM 88231
SIGN: ENRON NORTHERN NATURAL EUNICE PLANT
(RIGHT NEXT DOOR TO TEXACO PLANT)
USE UPS OR FED EX

TWP
P.O. BOX 70
EUNICE, NM 88231

* HAVE 2 DRUMS ON HAND ✓

* LOCKS ON SOME = 3 (DOES HAVE KEYS TO LOCKS)

13-782 500 SHEETS, FILLER, 5 SQUARE
42-381 50 SHEETS EYE-EASE® 5 SQUARE
42-382 100 SHEETS EYE-EASE® 5 SQUARE
42-389 200 SHEETS EYE-EASE® 5 SQUARE
42-392 100 RECYCLED WHITE 5 SQUARE
42-399 200 RECYCLED WHITE 5 SQUARE
National® Brand

MW-1

TD = 60'
SCREEN 50-60'
H2O TABLE 53'
WELL CAP 2" PVC

MW-2

TD = 59.0'
SCREEN = 49.0'-59.0'
H2O TBL = 51.9'
WELL CAP = 2" PVC

MW-3

TD = 65' BLS
SCREEN = 50-60' BLS
H2O TBL = 52' BLS
WELL CAP = 2" PVC

MW-4

TD = 67'
SCREEN = 49-64'
H2O TBL = 53.6'
2" PVC

MW-5

TD = 67'
SCREEN = 48-63'
H2O TBL = 51.8'
2" PVC

MW-6

TD = ~~[illegible]~~ 70'
SCREEN = 45-60'
H2O TBL = 51.9'
2" PVC

MW-7

TD = 67'
SCREEN = 48-63'
2" PVC
H2O TBL = 52.5'

* NET WILL SEND TO OUR OFFICE TOMORROW MORNING (8/11)

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

May 22, 1995

CERTIFIED MAIL
RETURN RECEIPT NO: P-667-242-263

Mr. Bill Kendrick
ENRON Operations Corp.
P.O. Box 1188
Houston, Texas 77251-11881

RE: SUPPLEMENTAL INVESTIGATION
EUNICE COMPRESSOR STATION

Dear Mr. Kendrick:

The New Mexico Oil Conservation Division (OCD) has completed a review of Northern Natural Gas Company's (NNG) December 19, 1994 "SUPPLEMENTAL ENVIRONMENTAL INVESTIGATION, NORTHERN NATURAL GAS COMPANY, EUNICE COMPRESSOR STATION". This document, which was received by the OCD on March 31, 1995, was submitted on behalf of NNG by ENRON Operations Corp. The document contains the results NNG's recent investigation of the extent of soil and ground water contamination at NNG's Eunice Compressor Station.

The investigation actions taken to date are satisfactory. However, the OCD defers comment on the source of ground water contamination at the site, due to the potential that prior operations at the adjacent Texaco Eunice #1 Gas Plant may be contributing to the ground water contamination observed. Consequently, the OCD has sent Texaco a letter requesting information on waste disposal activities at Texaco's facility.

In the interim, the OCD requires that NNG:

1. Sample and analyze ground water from all site monitor wells on a quarterly basis for concentrations of benzene, toluene, ethylbenzene, xylene (BTEX) and chlorinated organics using EPA approved methods.

   NOTE: Since there is no New Mexico Water Quality Control Commission (WQCC) ground water standard for total petroleum hydrocarbons (TPH), the OCD does not require that NNG analyze ground water samples for TPH.

2. Sample and analyze ground water from all site monitor wells on an annual basis for concentrations of polynuclear aromatic hydrocarbons (PAH) and major cations and anions using EPA approved methods.

3. Submit semiannual reports on the site ground water monitoring to the OCD by January 1 and July 1 of each respective year with the first report due on January 1, 1996. The reports will contain:

   a. A description of all monitoring activities which occurred during the previous semiannual period.

   b. A summary of the laboratory analytic results of water quality sampling of the monitor wells. The data will be presented in tabular form showing past and present sampling results.

   c. A water table elevation map using the water table elevation of the ground water in all monitor wells as measured on a quarterly basis.

4. Notify the OCD at least one week in advance of all scheduled activities such that the OCD has the opportunity to witness the events and/or split samples.

5. Submit all original documents to the OCD Santa Fe Office with copies provided to the OCD Hobbs District Office.

If you have any questions, please call me at (505) 827-7154.

Sincerely,

William C. Olson
Hydrogeologist
Environmental Bureau

xc: Jerry Sexton, OCD Hobbs District Supervisor
Wayne Price, OCD Hobbs Office

P 667 242 263

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TOTAL Postage & Fees	$
Postmark or Date	

PS Form **3800**, June 1990

Bill Olson

From: Bill Olson
To: Jerry Sexton
Cc: Wayne Price
Subject: ENRON Eunice Compressor
Date: Tuesday, May 16, 1995 3:59PM
Priority: High

Attached is a draft letter approving ENRON's recent investigation work at the Eunice Compressor Station. Please provide me with any comments by 4:00 pm on 5/18/95. Thanks!

<<File Attachment: MONITOR.REQ>>

Bill Olson

From: POSTOFFICE
To: Bill Olson
Subject: Registered: Wayne Price
Date: Wednesday, May 17, 1995 7:01AM

[013] ***** CONFIRMATION OF REGISTERED MAIL *****
Your message:

TO: Wayne Price DATE: 05-16-95
SUBJECT: ENRON Eunice Compressor TIME: 15:59

Was accessed on 05-17-95 07:00

Bill Olson

From: Jerry Sexton
Date sent: Wednesday, May 17, 1995 3:21PM
To: Bill Olson
Subject: Registered: Jerry Sexton

Your message
To: Jerry Sexton
Subject: ENRON Eunice Compressor
Date: Tuesday, May 16, 1995 3:59PM
was accessed on
Date: Wednesday, May 17, 1995 3:21PM

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

May 22, 1995

CERTIFIED MAIL
RETURN RECEIPT NO: P-667-242-264

Mr. C.R. Russell
Environmental Coordinator
Texaco Exploration & Production, Inc.
P.O. Box 1650
Tulsa, Oklahoma 74102

RE: TEXACO EUNICE #1 GAS PLANT
LEA COUNTY, NEW MEXICO

Dear Mr. Russell:

The New Mexico Oil Conservation Division (OCD) has been reviewing the results of ENRON Operations Corp. recent soil and ground water investigations at the Northern Natural Gas Company's (NNGC) Eunice Compressor Station which is directly adjacent to Texaco's Eunice #1 natural gas processing plant.

ENRON's investigation results have shown that ground water at the site is contaminated with hydrocarbons in excess of New Mexico Water Quality Control Commission ground water standards. The source of these contaminants is not clear. Some of these ground water contaminants appear to originate from offsite sources. In addition, documentation with the report included aerial photographs of the area taken from 1954 to 1992. These photographs show that a number of pits and disposal areas were located at Texaco's plant prior to construction of and during the operation of NNGC's Eunice Compressor Station.

Due to the accumulated information referenced above, the OCD requires that Texaco supply the following information to the OCD by July 28, 1995:

1. A map showing the location of all unlined/lined pits and any other surface or subsurface disposal areas that have been used over time at Texaco's facility.

2. Information on how the pits or disposal areas were constructed and operated.

3. The types and volumes of fluids or wastes which were disposed of in each area.

If you have any questions, please call me at (505) 827-7154.

Sincerely,

William C. Olson
Hydrogeologist
Environmental Bureau

xc: Jerry Sexton, OCD Hobbs District Supervisor
Wayne Price, OCD Hobbs District Office
ENRON @ Eunice File

DANIEL B. STEPHENS & ASSOCIATES, INC.
ENVIRONMENTAL SCIENTISTS AND ENGINEERS

April 17, 1995

0437-4215-95

Mr. William C. Olson
Environmental Bureau
New Mexico Oil Conservation Division
2040 S. Pacheco St.
Santa Fe, New Mexico 87505

Dear Bill:

Enclosed please find copies of the aerial photographs described in the report entitled *Supplemental Environmental Investigation, Northern Natural Gas Company, Eunice Compressor Station*. Please feel free to contact me with any questions or comments at (505) 822-9400.

Sincerely,

DANIEL B. STEPHENS & ASSOCIATES, INC.

Bob Marley

Bob Marley
Project Manager

Enclosure

DANIEL B. STEPHENS & ASSOCIATES, INC.
ENVIRONMENTAL SCIENTISTS AND ENGINEERS

April 4, 1995

0390-4215-95

Bill Olson
2040 S. Pacheco St.
Santa Fe, NM 87505

Dear Bill:

As requested by George Robinson, I am sending copies of the aerial photographs from the Enron Eunice Compressor Station. Please let me know if you need anything else.

Sincerely,

DANIEL B. STEPHENS & ASSOCIATES, INC.

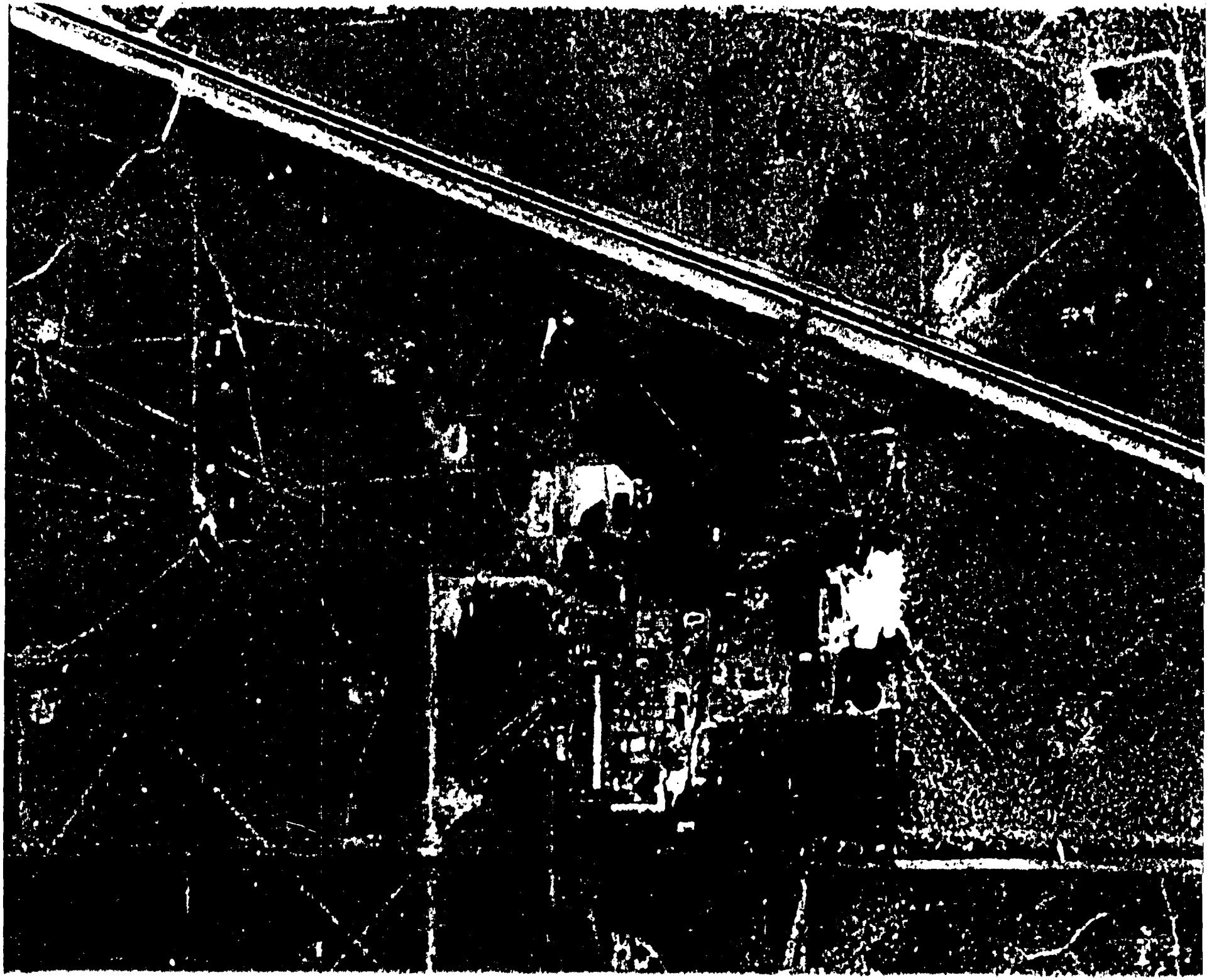
Joanne Hilton

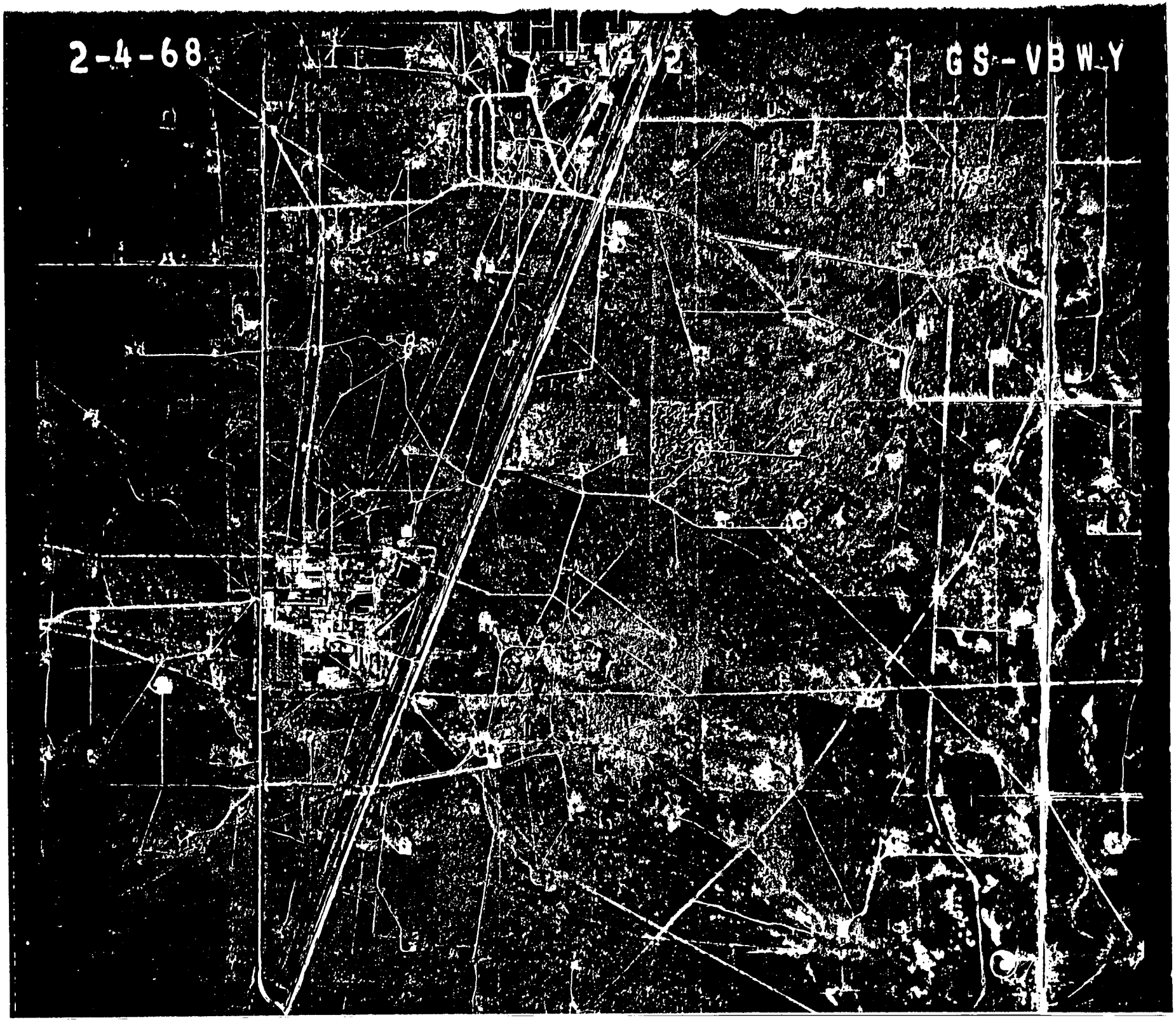
Joanne Hilton
Senior Hydrologist

Enclosure

SOIL AND GROUND-WATER INVESTIGATIONS • REMEDIAL ACTION • LITIGATION SUPPORT • VADOSE ZONE HYDROLOGY
6020 ACADEMY NE • SUITE 100 • ALBUQUERQUE, NM 87109 • (505) 822-9400 • FAX (505) 822-8877
ALBUQUERQUE • SANTA FE

1478




2-4-68
GS-VBWY


Bob Marley

ENRON
OPERATIONS CORP.

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

February 24, 1995

Mr. William C. Olson
Environmental Bureau
New Mexico Oil Conservation Division
2040 S. Pacheco St.
Santa Fe, New Mexico 87505

RE: Final Disposition of Investigation Derived Soil Cuttings
Northern Natural Gas Company Eunice Compressor Station

Dear Bill,

In the course of the subsurface investigation at the subject facility, approximately six cubic yards of potentially contaminated soil cuttings were collected from five on-site soil borings. This soil is currently stockpiled on plastic at the site.

Soil samples were collected in each boring at five foot intervals from the surface to total depth. Each sample was field screened using an OVM. Several soil samples were delivered to a lab for anlaysis by Method 8020 (BTEX) and Method 418.1 (TPH). Those samples selected for lab analysis included:

1. From soil borings MW-4, MW-6, and MW-7: two samples were selected from each boring, the sample collected from within the capillary fringe just above the ground water table and the sample from above the capillary fringe which indicated the highest OVM measurement,
2. From soil boring MW-5: only the sample collected from within the capillary fringe just above the ground water table was selected for lab analysis,
3. From soil boring SB-1: ten samples were selected, one sample collected from each five foot interval from the surface to the the capillary fringe just above the ground water table.

All samples analyzed by Methods 8020 and 418.1 were non-detect for BTEX compounds and TPH with only one exception, the sample collected from within the capillary fringe just above the ground water table at soil boring SB-1 indicated elevated concentrations of TPH, ethylbenzene, and total xylenes. A summary of the laboratory analysis are attached. A copy of the analytical results will be included in the investigation report to be delivered to your office by March 31, 1995.

The proposed final disposition of the investigation derived soil cuttings is to spread the soil out on the ground surface on-site within the boundaries of the NNG facility fence. Transwestern Pipeline Company, as operator of the subject facility, will implement the proposed disposition of investigation derived wastes upon review and approval by your office.

If you have any questions regarding this proposal, please contact me at (713) 646-7644 or George Robinson at (713) 646-7327.

Sincerely,

Bill Kendrick by

Bill Kendrick
EOC Environmental Affairs
Manager, Projects Group

gcr/BK

Verbal approval to
Bill Kendrick at 1045 hrs
on 4/12/95
Wil Olson

Table 4a. Summary of Soils Analyses for Organic Constituents
Monitor Well Borings
NNG Eunice Compressor Station

Constituent	Detection Limit	Sample No. (Sample Date)						
		MW-4 @ 9' (10/04/94)	MW-4 @ 52' (10/04/94)	MW-5 @ 52' (10/06/94)	MW-6 @ 12' (10/04/94)	MW-6 @ 52' (10/04/94)	MW-7 @ 17' (10/06/94)	MW-7 @ 52' (10/06/94)
Total petroleum hydrocarbons by EPA method 8015 modified (mg/kg)								
Gasoline range (C_6-C_{16})	10	ND	ND	ND	ND	ND	ND	ND
Diesel range (C_{16}-C_{36})	10	ND	ND	ND	ND	ND	ND	ND
Aromatic VOCs by EPA method 8020 (mg/kg)								
Benzene	0.05	ND	ND	ND	ND	ND	ND	ND
Toluene	0.05	ND	ND	ND	ND	ND	ND	ND
Ethylbenzene	0.05	ND	ND	ND	ND	ND	ND	ND
Total xylenes	0.05	ND	ND	ND	ND	ND	ND	ND

Note: All analyses performed by Hall Environmental Analysis Laboratory, Albuquerque, NM

ND = Not detected
VOCs = Volatile organic compounds

Table 4b. Summary of Soils Analyses for Organic Constituents
Soil Boring SB-1
NNG Eunice Compressor Station

Constituent	Detection Limit	Sample No. (Sample Date)									
		SB-1 @ 7' (10/07/94)	SB-1 @ 10-12' (10/07/94)	SB-1 @ 15-17' (10/07/94)	SB-1 @ 20-22' (10/07/94)	SB-1 @ 27' (10/07/94)	SB-1 @ 32' (10/07/94)	SB-1 @ 37' (10/07/94)	SB-1 @ 42' (10/07/94)	SB-1 @ 47' (10/07/94)	SB-1 @ 52 (10/07/94)
Total petroleum hydrocarbons by EPA method 8015 modified (mg/kg)											
Gasoline range (C_6-C_{16})	10	ND	ND	ND	ND	ND	ND	ND	ND	ND	110
Diesel range (C_{16}-C_{36})	10	ND	ND	ND	ND	ND	ND	ND	ND	ND	570
Aromatic VOCs by EPA method 8020 (mg/kg)											
Benzene	0.05	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Toluene	0.05	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Ethylbenzene	0.05	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.17
Total xylenes	0.05	ND	ND	ND	ND	ND	ND	ND	ND	ND	0.84

Note: All analyses performed by Hall Environmental Analysis Laboratory, Albuquerque, NM

ND = Not detected
VOCs = Volatile organic compounds

ENRON
OPERATIONS CORP.

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

January 24, 1995

Mr. William C. Olson
Environmental Bureau
New Mexico Oil Conservation Division
2040 S. Pacheco St.
Santa Fe, New Mexico 87505

RE: Soil and Ground Water Investigations
NNG Eunice Compressor Station
Lea County, New Mexico

Dear Bill,

Your office approved an investigation work plan for the subject facility in a letter dated September 26, 1994. Condition #5 of the approval requires that "NNG will submit to the OCD by January 27, 1995 a report containing the results of the investigation activities. The report will include a final report on the excavation of contaminated soils at the facility." The investigation report and closure activities outlined in the closure plan have been completed, however, NNG is still in the process completing an internal review of the report. Upon completion of the internal review, NNG will submit the report to the NMOCD. The report will be submitted no later than March 31, 1995.

If you have any questions regarding this change in schedule, please contact me at (713) 646-7644 or George Robinson at (713) 646-7327.

Sincerely,

Bill Kendrick
Manager, Projects Group

gcr/BK

ENRON
OPERATIONS CORP.

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

January 12, 1995

Mr. William C. Olson
Environmental Bureau
New Mexico Oil Conservation Division
2040 S. Pacheco St.
Santa Fe, New Mexico 87505

RE: Final Disposition of Investigation Derived Wastes
Northern Natural Gas Company Eunice Compressor Station
Lea County, New Mexico

Dear Bill,

In the course of the subsurface investigation at the subject facility, approximately 140 gallons of potentially contaminated ground water was collected from seven on-site ground water monitor wells. This water is currently stored in five drums at the site. The source, quantity, and proposed disposition of water in each drum is summarized below in Table 1. The proposed disposition is based on laboratory analysis of ground water samples from each monitor well. A summary of the laboratory analysis and a copy of the analytical results are attached.

Table 1. Source, Quantity, and Proposed Disposition of Investigation Derived Waste Water

Source	Quantity (gallons)	Proposed Disposition
MW-1 & MW-4	30	Contains low concentrations of chlorinated compounds; therefore dispose of as hazardous waste
MW-2 & MW-3	10	Contains concentration of benzene greater than 0.500 mg/L; therefore dispose of as hazardous waste
MW-5	40	Contains concentration of benzene greater than NMWQCC standard but less than 0.500 mg/L; therefore dispose of in on-site oily wastewater tank
MW-6	30	Does not contain any constituent greater than NMWQCC standards; therefore dispose of on ground surface at the site
MW-7	30	Does not contain any constituent, except barium, greater than NMWQCC standards; therefore dispose of on ground surface at the site
Total	140	

Transwestern Pipeline Company, as operator of the subject facility, will implement the proposed disposition of investigation derived wastes upon review and approval by your office.

1/25/95
Verbal approval
to George Robinson
Will Olson

If you have any questions regarding this proposal, please contact me at (713) 646-7644 or George Robinson at (713) 646-7327.

Sincerely,

for

Bill Kendrick
EOC Environmental Affairs
Manager, Projects Group

gcr/BK

Table 5. Summary of Ground-Water Analyses for Organic Constituents
NNG Eunice Compressor Station
Page 1 of 2

Constituent	Detection Limit	Well No. (Sample Date) MW-1 (10/03/94)	MW-2 (10/03/94)	MW-3 (10/03/94)	MW-4 (10/04/94)	MW-5 (10/06/94)	MW-6 (10/05/94)	MW-7 (10/07/94)	NMWQCC Standard
Total petroleum hydrocarbons by EPA method 8015 modified (mg/L)									
Gasoline range (C_6-C_{16})	0.05	0.08	15[a]	19[b]	ND	0.27	ND	1.2	None
Diesel range (C_{16}-C_{36})	1.0	ND	ND	12	ND	ND	ND	ND	None
Aromatic VOCs by EPA method 8020 (µg/L)									
Benzene	0.5	1.6	**6300**[a]	**3000**[b]	ND	**70**	0.7	8.1	10
Toluene	0.5	0.6	ND[a]	**1000**[b]	ND	ND	ND	ND	750
Ethylbenzene	0.5	1.1	**1300**[a]	**1200**[b]	ND	44	ND	42	750
Total xylenes	0.5	0.9	ND[a]	**2600**[b]	ND	0.9	ND	99	620
Halogenated VOCs by EPA method 8010 (µg/L)									
1,2-Dichlorobenzene	0.2	0.8	ND[a]	ND[b]	ND	ND	ND	ND	None
1,4-Dichlorobenzene	0.2	0.9	ND[a]	ND[b]	0.5	ND	ND	ND	None
1,1-Dichloroethane	0.2	ND	ND[a]	ND[b]	0.4	ND	ND	ND	25
1,2-Dichloroethane	0.2	ND	ND[a]	ND[b]	0.4	ND	ND	ND	10
cis-1,2-Dichloroethene	0.2	0.3	ND[a]	ND[b]	ND	ND	ND	ND	None
1,2-Dichloropropane	0.2	0.3	ND[a]	ND[b]	0.7	ND	ND	ND	None
1,1,2-Trichloroethane	0.2	ND	ND[a]	ND[b]	0.4	ND	ND	ND	10

Notes: All analyses performed by Hall Environmental Analysis Laboratory, Albuquerque, NM
Bold values indicate concentration exceeds NMWQCC ground-water standard

NMWQCC = New Mexico Water Quality Control Commission
ND = Not detected
VOCs = Volatile organic compounds

[a] Sample analyzed at 40x dilution; accordingly, detection limits were 40x the value listed
[b] Sample analyzed at 20x dilution; accordingly, detection limits were 40x the value listed

Table 5. Summary of Ground-Water Analyses for Organic Constituents
NNG Eunice Compressor Station
Page 2 of 2

Constituent	Detection Limit	Well No. (Sample Date) MW-1 (10/03/94)	MW-2 (10/03/94)	MW-3 (10/03/94)	MW-4 (10/04/94)	MW-5 (10/06/94)	MW-6 (10/05/94)	MW-7 (10/07/94)	NMWQCC Standard
Polynuclear aromatic hydrocarbons by EPA method 8100 (µg/L)									
Naphthalene	0.5	ND	6.3	**95**	ND	0.5	ND	0.7	30[c]
1-Methylnaphthalene	0.5	0.9	1.7	**200**	ND	ND	ND	0.9	
2-Methylnaphthalene	0.5	ND	2.3	**88**	0.5	ND	ND	1.9	
Acenaphthene	0.5	ND	ND	17[d]	1.1	0.8	0.7	0.6	None
Fluorene	0.5	ND	0.9	15[d]	ND	ND	ND	ND	None
Pyrene	0.5	ND	ND	130[d]	ND	ND	ND	ND	None

Notes: All analyses performed by Hall Environmental Analysis Laboratory, Albuquerque, NM
Bold values indicate concentration exceeds NMWQCC ground-water standard

NMWQCC = New Mexico Water Quality Control Commission
ND = Not detected
VOCs = Volatile organic compounds

[c] NMWQCC standard is for total naphthalene, which includes naphthalene, 1-methylnaphthalene, and 2-methylnaphthalene
[d] Sample analyzed at 2x dilution; accordingly, detection limit was 1.0 µg/L

Table 6. Summary of Ground-Water Analyses for Inorganic Constituents NNG Eunice Compressor Station

Constituent	Detection Limit	Well No. (Sample Date) MW-1 (10/03/94)	MW-2 (10/03/94)	MW-3 (10/03/94)	MW-4 (10/04/94)	MW-5 (10/06/94)	MW-6 (10/05/94)	MW-7 (10/07/94)	NMWQCC Standard
Major ions (mg/L)									
Calcium	0.1	133	96.2	77.2	89.9	16.1	54.6	129	None
Potassium	1.0	3.1	5.8	4.8	6.5	20.1	12.2	8.5	None
Magnesium	0.1	119	98.2	42.1	68.8	29.7	59.8	162	None
Sodium	0.1	346	2120	100	626	1840	1560	1130	None
Total alkalinity (as $CaCO_3$)	1.0	582	1110	794	510	803	576	433	None
Chloride	0.5	**750**	**3000**	**620**	**940**	**2400**	**2100**	**2100**	250
NO_2 /NO_3 - N, total	0.06	ND	ND	ND	ND	0.08	ND	ND	10.0
Sulfate	5	ND	20	20	ND	9	ND	ND	600
Total dissolved solids	10	**1700**	**5900**	**2800**	**2000**	**4700**	**4000**	**4000**	1000
Metals (mg/L)									
Silver	0.010	ND	ND	ND	ND	ND	ND	ND	0.05
Arsenic	0.005	0.039	0.029	0.027	0.015	0.027	0.017	0.012	0.1
Barium	0.01	**1.52**	**1.33**	**5.01**	0.445	0.934	0.997	**9.72**	1.0
Cadmium	0.0005	ND	0.0011	ND	ND	ND	0.0012	ND	0.01
Chromium	0.010	ND	ND	ND	ND	ND	ND	ND	0.05
Copper	0.010	ND	ND	ND	ND	ND	ND	ND	1.0
Iron	0.020	**2.26**	0.345	**16.9**	ND	0.047	ND	ND	1.0
Mercury	0.0002	ND	ND	ND	ND	ND	ND	ND	0.002
Manganese	0.010	0.058	**0.262**	**1.48**	**0.206**	0.020	0.065	0.100	0.2
Lead	0.002	ND	ND	0.003	ND	ND	ND	ND	0.05
Selenium	0.005	ND	ND	ND	ND	ND	ND	ND	0.05
Zinc	0.020	ND	ND	ND	ND	ND	ND	ND	10

Notes: All analyses performed by Analytical Technologies, Inc., Albuquerque, NM
Bold values indicate concentration exceeds NMWQCC ground-water standard.
Metals samples were field filtered.

NMWQCC = New Mexico Water Quality Control Commission
ND = Not detected

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

September 26, 1994

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

CERTIFIED MAIL
RETURN RECEIPT NO: P-667-242-166

Mr. Bill Kendrick
ENRON Operations Corp.
P.O. Box 1188
Houston, Texas 77251-11881

RE: INVESTIGATION WORK PLAN
EUNICE COMPRESSOR STATION

Dear Mr. Kendrick:

The New Mexico Oil Conservation Division (OCD) has completed a review of Northern Natural Gas Company's (NNG) September 19, 1994 "SOIL AND GROUND WATER INVESTIGATION, EUNICE COMPRESSOR STATION, LEA COUNTY, NEW MEXICO" which was submitted on behalf of NNG by ENRON Operations Corp. This document contains NNG's proposed work plan for additional soil borings and installation of ground water monitoring wells to further define the extent of contamination related to NNG's activities at the Eunice Compressor Station.

The work plan as contained in the above referenced document is approved with the following conditions:

1. All wastes generated during the investigation activities will be disposed of at an OCD approved facility.

2. In addition to the ground water analyses proposed, NNG will analyze ground water for polynuclear aromatic hydrocarbons (PAH's), heavy metals and major cations and anions using appropriate EPA approved methods.

NOTE: Because there is no New Mexico Water Quality Control Commission ground water standard for total petroleum hydrocarbons (TPH), the OCD does not require that NNG analyze ground water for TPH.

3. Prior to disposal of the stockpiled contaminated soils at the OCD permitted C & C Landfarm , NNG will supply OCD with the results of analytical sampling which demonstrate that the soils are characteristically non-hazardous.

4. NNG will submit to the OCD by January 27, 1995 a report containing the results of the investigation activities. The report will include a final report on the excavation of contaminated soils at the facility.

5. NNG will notify the OCD at least one week in advance of scheduled activities such that the OCD has the opportunity to witness the events and/or split samples.

6. All original documents will be sent to the OCD Santa Fe Office with copies sent to the OCD Hobbs Office.

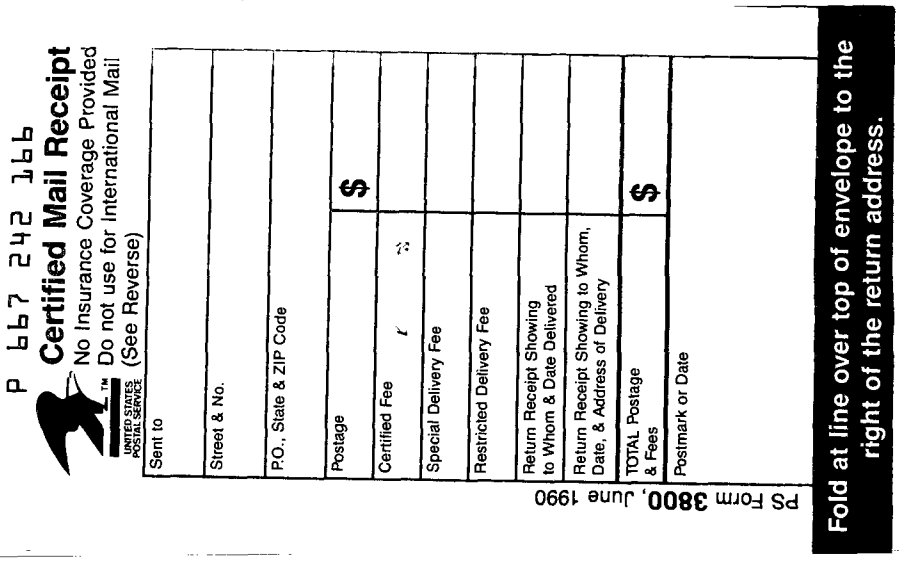
Please be advised that OCD approval does not relieve NNG of liability should the investigation fail to adequately define the extent of contamination related to NNG's activities. In addition, OCD approval does not relieve NNG of responsibility for compliance with any other federal, state or local laws and/or regulations.

If you have any questions, please contact me at (505) 827-5885.

Sincerely,

William C. Olson
Hydrogeologist
Environmental Bureau

xc: Jerry Sexton, OCD Hobbs District Supervisor
Wayne Price, OCD Hobbs Office



Hall Environmental Analysis Laboratory

Hall Environmental Analysis Laboratory
2403 San Mateo NE, Suite P-13
Albuquerque, NM 87110

10/21/94

Daniel B. Stephens and Associates, Inc.
6020 Academy NE, Suite 100
Albuquerque, NM 87109

Dear Mr. Bob Marley,

Enclosed are the results for the analyses that were requested. These were done according to EPA procedures or the equivalent.

Detection limits are determined by EPA methodology. Unless noted on sample page, all criteria for QA/QC acceptance levels fall within established parameters. These parameters are modeled from the EPA-600 14-79 019, March 1979, "Handbook for Analytical Quality Control in Water and Waste Water."

Please don't hesitate to contact me for any additional information or clarifications.

Sincerely,

Scott Hallenbeck 10/21/94

Scott Hallenbeck, Lab Manager

Project: ENRON - Eunice

Results for sample: MW-1

Date collected: 10/3/94	Date received: 10/6/94
Date extracted: NA	Date analyzed: 10/13/94
Client: Daniel B. Stephens and Associates, Inc.	
Project Name: ENRON - Eunice	HEAL #: 9410019-1
Project Manager: Bob Marley	Sampled by: BM/CP
Matrix: Aqueous	

Test: EPA 8010/8020

Analyte:	Results	Detection Limit	Units
Benzene	1.6	0.5	PPB (UG/L)
Bromodichloromethane	nd	0.2	PPB (UG/L)
Bromoform	nd	1.0	PPB (UG/L)
Bromomethane	nd	1.0	PPB (UG/L)
Carbon Tetrachloride	nd	0.2	PPB (UG/L)
Chlorobenzene	nd	0.2	PPB (UG/L)
Chloroethane	nd	0.2	PPB (UG/L)
Chloroform	nd	0.2	PPB (UG/L)
Chloromethane	nd	0.2	PPB (UG/L)
2-Chloroethylvinyl Ether	nd	1.0	PPB (UG/L)
Dibromochloromethane	nd	0.2	PPB (UG/L)
1,3-Dichlorobenzene	nd	0.2	PPB (UG/L)
1,2-Dichlorobenzene	0.8	0.2	PPB (UG/L)
1,4-Dichlorobenzene	0.9	0.2	PPB (UG/L)
Dichlorodifluoromethane	nd	0.2	PPB (UG/L)
1,1-Dichloroethane	nd	0.2	PPB (UG/L)
1,2-Dichloroethane	nd	0.2	PPB (UG/L)
1,1-Dichloroethene	nd	0.2	PPB (UG/L)
1,2-Dichloroethene (Cis)	0.3	0.2	PPB (UG/L)
1,2-Dichloroethene (Trans)	nd	0.2	PPB (UG/L)
1,2-Dichloropropane	0.3	0.2	PPB (UG/L)
cis-1,3-Dichloropropene	nd	0.2	PPB (UG/L)
trans-1,3-Dichloropropene	nd	0.2	PPB (UG/L)
Ethylbenzene	1.1	0.5	PPB (UG/L)
Dichloromethane	nd	2.0	PPB (UG/L)
1,1,2,2-Tetrachloroethane	nd	0.2	PPB (UG/L)
Tetrachloroethene (PCE)	nd	0.2	PPB (UG/L)
Toluene	0.6	0.5	PPB (UG/L)
1,1,1-Trichloroethane	nd	0.2	PPB (UG/L)
1,1,2-Trichloroethane	nd	0.2	PPB (UG/L)
Trichloroethene (TCE)	nd	0.2	PPB (UG/L)
Vinyl Chloride	nd	0.2	PPB (UG/L)
Xylenes (Total)	0.9	0.5	PPB (UG/L)
Trichlorofluoromethane	nd	0.2	PPB (UG/L)
MTBE	nd	2.5	PPB (UG/L)

BFB (Surrogate) Recovery = 91 %
BCM (Surrogate) Recovery = 92 %
Dilution Factor = 1

Results for sample: MW-1

Date collected: 10/3/94	Date received: 10/6/94
Date extracted: 10/10/94	Date analyzed: 10/15/94
Client: Daniel B. Stephens and Associates, Inc.	
Project Name: ENRON - Eunice	Heal #: 9410019-1
Project Manager: Bob Marley	Sampled by: BM/CP
Matrix: Aqueous	

Test: EPA 8100

Compound	Result	Detection limit	Units
Naphthalene	nd	0.5	PPB (UG/L)
2-Methyl Naphthalene	nd	0.5	PPB (UG/L)
1-Methyl Naphthalene	0.9	0.5	PPB (UG/L)
Acenaphthalene	nd	0.5	PPB (UG/L)
Acenaphthene	nd	0.5	PPB (UG/L)
Fluorene	nd	0.5	PPB (UG/L)
Phenanthrene	nd	0.5	PPB (UG/L)
Anthracene	nd	0.5	PPB (UG/L)
Fluoranthrene	nd	0.5	PPB (UG/L)
Pyrene	nd	0.5	PPB (UG/L)
Benzo (a) anthracene	nd	0.5	PPB (UG/L)
Chrysene	nd	0.5	PPB (UG/L)
Benzo (b) fluoranthene	nd	0.5	PPB (UG/L)
Benzo (k) fluoranthene	nd	0.5	PPB (UG/L)
Benzo (a) pyrene	nd	0.5	PPB (UG/L)
Indeno (1,2,3-cd) pyrene	nd	1.0	PPB (UG/L)
Dibenzo (a,h) anthracene	nd	1.0	PPB (UG/L)
Benzo (g,h,i) perylene	nd	1.0	PPB (UG/L)

Hexadecane (Surrogate) Recovery = 94 %

Dilution Factor = 1

Results for sample: MW-1

Date collected: 10/3/94	Date received: 10/6/94
Date extracted: 10/11/94	Date analyzed: 10/11,16/94
Client: Daniel B. Stephens and Associates, Inc.	
Project Name: ENRON - Eunice	Heal #: 9410019-1
Project Manager: Bob Marley	Sampled by: BM/CP
Matrix: Aqueous	

Test: EPA 8015 Modified

Compound	Result	Detection Limit	Units
Gasoline	0.08	0.05	PPM (MG/L)

BFB (Surrogate) Recovery = 100 %

Dilution Factor = 1

Test: EPA 8015 Modified

Compound	Result	Detection Limit	Units
Diesel	nd	1.0	PPM (MG/L)

DNOP (Surrogate) Recovery = 108 %

Dilution Factor = 1

Results for sample: MW-3

Date collected: 10/3/94	Date received: 10/6/94
Date extracted: NA	Date analyzed: 10/13/94
Client: Daniel B. Stephens and Associates, Inc.	
Project Name: ENRON - Eunice	HEAL #: 9410019-2
Project Manager: Bob Marley	Sampled by: BM/CP
Matrix: Aqueous	

Test: EPA 8010/8020

Analyte:	Results	Detection Limit	Units
Benzene	3,000	10	PPB (UG/L)
Bromodichloromethane	nd	4.0	PPB (UG/L)
Bromoform	nd	20	PPB (UG/L)
Bromomethane	nd	20	PPB (UG/L)
Carbon Tetrachloride	nd	4.0	PPB (UG/L)
Chlorobenzene	nd	4.0	PPB (UG/L)
Chloroethane	nd	4.0	PPB (UG/L)
Chloroform	nd	4.0	PPB (UG/L)
Chloromethane	nd	4.0	PPB (UG/L)
2-Chloroethylvinyl Ether	nd	20	PPB (UG/L)
Dibromochloromethane	nd	4.0	PPB (UG/L)
1,3-Dichlorobenzene	nd	4.0	PPB (UG/L)
1,2-Dichlorobenzene	nd	4.0	PPB (UG/L)
1,4-Dichlorobenzene	nd	4.0	PPB (UG/L)
Dichlorodifluoromethane	nd	4.0	PPB (UG/L)
1,1-Dichloroethane	nd	4.0	PPB (UG/L)
1,2-Dichloroethane	nd	4.0	PPB (UG/L)
1,1-Dichloroethene	nd	4.0	PPB (UG/L)
1,2-Dichloroethene (Cis)	nd	4.0	PPB (UG/L)
1,2-Dichloroethene (Trans)	nd	4.0	PPB (UG/L)
1,2-Dichloropropane	nd	4.0	PPB (UG/L)
cis-1,3-Dichloropropene	nd	4.0	PPB (UG/L)
trans-1,3-Dichloropropene	nd	4.0	PPB (UG/L)
Ethylbenzene	1,200	10	PPB (UG/L)
Dichloromethane	nd	20	PPB (UG/L)
1,1,2,2-Tetrachloroethane	nd	4.0	PPB (UG/L)
Tetrachloroethene (PCE)	nd	4.0	PPB (UG/L)
Toluene	1,000	10	PPB (UG/L)
1,1,1-Trichloroethane	nd	4.0	PPB (UG/L)
1,1,2-Trichloroethane	nd	4.0	PPB (UG/L)
Trichloroethene (TCE)	nd	4.0	PPB (UG/L)
Vinyl Chloride	nd	4.0	PPB (UG/L)
Xylenes (Total)	2,600	10	PPB (UG/L)
Trichlorofluoromethane	nd	4.0	PPB (UG/L)
MTBE	nd	50	PPB (UG/L)

BFB (Surrogate) Recovery = 89 %
BCM (Surrogate) Recovery = 80 %
Dilution Factor = 20

Results for sample: MW-3

Date collected: 10/3/94	Date received: 10/6/94
Date extracted: 10/10/94	Date analyzed: 10/15/94
Client: Daniel B. Stephens and Associates, Inc.	
Project Name: ENRON - Eunice	Heal #: 9410019-2
Project Manager: Bob Marley	Sampled by: BM/CP
Matrix: Aqueous	

Test: EPA 8100

Compound	Result	Detection limit	Units
Naphthalene	95	1.0	PPB (UG/L)
2-Methyl Naphthalene	88	1.0	PPB (UG/L)
1-Methyl Naphthalene	200	1.0	PPB (UG/L)
Acenaphthalene	nd	1.0	PPB (UG/L)
Acenaphthene	17	1.0	PPB (UG/L)
Fluorene	15	1.0	PPB (UG/L)
Phenanthrene	nd	1.0	PPB (UG/L)
Anthracene	nd	1.0	PPB (UG/L)
Fluoranthrene	nd	1.0	PPB (UG/L)
Pyrene	130	1.0	PPB (UG/L)
Benzo (a) anthracene	nd	1.0	PPB (UG/L)
Chrysene	nd	1.0	PPB (UG/L)
Benzo (b) fluoranthene	nd	1.0	PPB (UG/L)
Benzo (k) fluoranthene	nd	1.0	PPB (UG/L)
Benzo (a) pyrene	nd	1.0	PPB (UG/L)
Indeno (1,2,3-cd) pyrene	nd	2.0	PPB (UG/L)
Dibenzo (a,h) anthracene	nd	2.0	PPB (UG/L)
Benzo (g,h,i) perylene	nd	2.0	PPB (UG/L)

Hexadecane (Surrogate) Recovery = ** %

Dilution Factor = 1

** Surrogate non-recoverable due to matrix interference

Results for sample: MW-3

Date collected: 10/3/94	Date received: 10/6/94
Date extracted: 10/11/94	Date analyzed: 10/11,16/94
Client: Daniel B. Stephens and Associates, Inc.	
Project Name: ENRON - Eunice	Heal #: 9410019-2
Project Manager: Bob Marley	Sampled by: BM/CP
Matrix: Aqueous	

Test: EPA 8015 Modified

Compound	Result	Detection Limit	Units
Gasoline	19	1.0	PPM (MG/L)

BFB (Surrogate) Recovery = 118 %

Dilution Factor = 20

Test: EPA 8015 Modified

Compound	Result	Detection Limit	Units
Diesel	12	1.0	PPM (MG/L)

DNOP (Surrogate) Recovery = 111 %

Dilution Factor = 1

Results for sample: MW-2

Date collected: 10/3/94	Date received: 10/6/94
Date extracted: NA	Date analyzed: 10/13/94
Client: Daniel B. Stephens and Associates, Inc.	
Project Name: ENRON - Eunice	HEAL #: 9410019-3
Project Manager: Bob Marley	Sampled by: BM/CP
Matrix: Aqueous	

Test: EPA 8010/8020

Analyte:	Results	Detection Limit	Units
Benzene	6,300	20	PPB (UG/L)
Bromodichloromethane	nd	8.0	PPB (UG/L)
Bromoform	nd	20	PPB (UG/L)
Bromomethane	nd	20	PPB (UG/L)
Carbon Tetrachloride	nd	8.0	PPB (UG/L)
Chlorobenzene	nd	8.0	PPB (UG/L)
Chloroethane	nd	8.0	PPB (UG/L)
Chloroform	nd	8.0	PPB (UG/L)
Chloromethane	nd	8.0	PPB (UG/L)
2-Chloroethylvinyl Ether	nd	20	PPB (UG/L)
Dibromochloromethane	nd	8.0	PPB (UG/L)
1,3-Dichlorobenzene	nd	8.0	PPB (UG/L)
1,2-Dichlorobenzene	nd	8.0	PPB (UG/L)
1,4-Dichlorobenzene	nd	8.0	PPB (UG/L)
Dichlorodifluoromethane	nd	8.0	PPB (UG/L)
1,1-Dichloroethane	nd	8.0	PPB (UG/L)
1,2-Dichloroethane	nd	8.0	PPB (UG/L)
1,1-Dichloroethene	nd	8.0	PPB (UG/L)
1,2-Dichloroethene (Cis)	nd	8.0	PPB (UG/L)
1,2-Dichloroethene (Trans)	nd	8.0	PPB (UG/L)
1,2-Dichloropropane	nd	8.0	PPB (UG/L)
cis-1,3-Dichloropropene	nd	8.0	PPB (UG/L)
trans-1,3-Dichloropropene	nd	8.0	PPB (UG/L)
Ethylbenzene	1,300	20	PPB (UG/L)
Dichloromethane	nd	20	PPB (UG/L)
1,1,2,2-Tetrachloroethane	nd	8.0	PPB (UG/L)
Tetrachloroethene (PCE)	nd	8.0	PPB (UG/L)
Toluene	nd	20	PPB (UG/L)
1,1,1-Trichloroethane	nd	8.0	PPB (UG/L)
1,1,2-Trichloroethane	nd	8.0	PPB (UG/L)
Trichloroethene (TCE)	nd	8.0	PPB (UG/L)
Vinyl Chloride	nd	8.0	PPB (UG/L)
Xylenes (Total)	nd	20	PPB (UG/L)
Trichlorofluoromethane	nd	8.0	PPB (UG/L)
MTBE	nd	100	PPB (UG/L)

BFB (Surrogate) Recovery = 93 %
BCM (Surrogate) Recovery = 89 %
Dilution Factor = 40

Results for sample: MW-2

Date collected: 10/3/94	Date received: 10/6/94
Date extracted: 10/10/94	Date analyzed: 10/15/94
Client: Daniel B. Stephens and Associates, Inc.	
Project Name: ENRON - Eunice	Heal #: 9410019-3
Project Manager: Bob Marley	Sampled by: BM/CP
Matrix: Aqueous	

Test: EPA 8100

Compound	Result	Detection limit	Units
Naphthalene	6.3	0.5	PPB (UG/L)
2-Methyl Naphthalene	2.3	0.5	PPB (UG/L)
1-Methyl Naphthalene	1.7	0.5	PPB (UG/L)
Acenaphthalene	nd	0.5	PPB (UG/L)
Acenaphthene	nd	0.5	PPB (UG/L)
Fluorene	0.9	0.5	PPB (UG/L)
Phenanthrene	nd	0.5	PPB (UG/L)
Anthracene	nd	0.5	PPB (UG/L)
Fluoranthrene	nd	0.5	PPB (UG/L)
Pyrene	nd	0.5	PPB (UG/L)
Benzo (a) anthracene	nd	0.5	PPB (UG/L)
Chrysene	nd	0.5	PPB (UG/L)
Benzo (b) fluoranthene	nd	0.5	PPB (UG/L)
Benzo (k) fluoranthene	nd	0.5	PPB (UG/L)
Benzo (a) pyrene	nd	0.5	PPB (UG/L)
Indeno (1,2,3-cd) pyrene	nd	1.0	PPB (UG/L)
Dibenzo (a,h) anthracene	nd	1.0	PPB (UG/L)
Benzo (g,h,i) perylene	nd	1.0	PPB (UG/L)

Hexadecane (Surrogate) Recovery = 101

Dilution Factor = 1

Results for sample: MW-2

Date collected: 10/3/94	Date received: 10/6/94
Date extracted: 10/11/94	Date analyzed: 10/11,16/94
Client: Daniel B. Stephens and Associates, Inc.	
Project Name: ENRON - Eunice	Heal #: 9410019-3
Project Manager: Bob Marley	Sampled by: BM/CP
Matrix: Aqueous	

Test: EPA 8015 Modified

Compound	Result	Detection Limit	Units
Gasoline	15	2.0	PPM (MG/L)

BFB (Surrogate) Recovery = 103 %

Dilution Factor = 40

Test: EPA 8015 Modified

Compound	Result	Detection Limit	Units
Diesel	nd	1.0	PPM (MG/L)

DNOP (Surrogate) Recovery = 110 %

Dilution Factor = 1

Results for sample: MW-4

Date collected: 10/4/94	Date received: 10/6/94
Date extracted: NA	Date analyzed: 10/13/94
Client: Daniel B. Stephens and Associates, Inc.	
Project Name: ENRON - Eunice	HEAL #: 9410019-4
Project Manager: Bob Marley	Sampled by: BM/CP
Matrix: Aqueous	

Test: EPA 8010/8020

Analyte:	Results	Detection Limit	Units
Benzene	nd	0.5	PPB (UG/L)
Bromodichloromethane	nd	0.2	PPB (UG/L)
Bromoform	nd	1.0	PPB (UG/L)
Bromomethane	nd	1.0	PPB (UG/L)
Carbon Tetrachloride	nd	0.2	PPB (UG/L)
Chlorobenzene	nd	0.2	PPB (UG/L)
Chloroethane	nd	0.2	PPB (UG/L)
Chloroform	nd	0.2	PPB (UG/L)
Chloromethane	nd	0.2	PPB (UG/L)
2-Chloroethylvinyl Ether	nd	1.0	PPB (UG/L)
Dibromochloromethane	nd	0.2	PPB (UG/L)
1,3-Dichlorobenzene	nd	0.2	PPB (UG/L)
1,2-Dichlorobenzene	nd	0.2	PPB (UG/L)
1,4-Dichlorobenzene	0.5	0.2	PPB (UG/L)
Dichlorodifluoromethane	nd	0.2	PPB (UG/L)
1,1-Dichloroethane	0.4	0.2	PPB (UG/L)
1,2-Dichloroethane	0.4	0.2	PPB (UG/L)
1,1-Dichloroethene	nd	0.2	PPB (UG/L)
1,2-Dichloroethene (Cis)	nd	0.2	PPB (UG/L)
1,2-Dichloroethene (Trans)	nd	0.2	PPB (UG/L)
1,2-Dichloropropane	0.7	0.2	PPB (UG/L)
cis-1,3-Dichloropropene	nd	0.2	PPB (UG/L)
trans-1,3-Dichloropropene	nd	0.2	PPB (UG/L)
Ethylbenzene	nd	0.5	PPB (UG/L)
Dichloromethane	nd	2.0	PPB (UG/L)
1,1,2,2-Tetrachloroethane	nd	0.2	PPB (UG/L)
Tetrachloroethene (PCE)	nd	0.2	PPB (UG/L)
Toluene	nd	0.5	PPB (UG/L)
1,1,1-Trichloroethane	nd	0.2	PPB (UG/L)
1,1,2-Trichloroethane	0.4	0.2	PPB (UG/L)
Trichloroethene (TCE)	nd	0.2	PPB (UG/L)
Vinyl Chloride	nd	0.2	PPB (UG/L)
Xylenes (Total)	nd	0.5	PPB (UG/L)
Trichlorofluoromethane	nd	0.2	PPB (UG/L)
MTBE	nd	2.5	PPB (UG/L)

BFB (Surrogate) Recovery = 88 %
BCM (Surrogate) Recovery = 83 %
Dilution Factor = 1

Results for sample: MW-4

Date collected: 10/4/94	Date received: 10/6/94
Date extracted: 10/10/94	Date analyzed: 10/15/94
Client: Daniel B. Stephens and Associates, Inc.	
Project Name: ENRON - Eunice	Heal #: 9410019-4
Project Manager: Bob Marley	Sampled by: BM/CP
Matrix: Aqueous	

Test: EPA 8100

Compound	Result	Detection limit	Units
Naphthalene	nd	0.5	PPB (UG/L)
2-Methyl Naphthalene	0.5	0.5	PPB (UG/L)
1-Methyl Naphthalene	nd	0.5	PPB (UG/L)
Acenaphthalene	nd	0.5	PPB (UG/L)
Acenaphthene	1.1	0.5	PPB (UG/L)
Fluorene	nd	0.5	PPB (UG/L)
Phenanthrene	nd	0.5	PPB (UG/L)
Anthracene	nd	0.5	PPB (UG/L)
Fluoranthrene	nd	0.5	PPB (UG/L)
Pyrene	nd	0.5	PPB (UG/L)
Benzo (a) anthracene	nd	0.5	PPB (UG/L)
Chrysene	nd	0.5	PPB (UG/L)
Benzo (b) fluoranthene	nd	0.5	PPB (UG/L)
Benzo (k) fluoranthene	nd	0.5	PPB (UG/L)
Benzo (a) pyrene	nd	0.5	PPB (UG/L)
Indeno (1,2,3-cd) pyrene	nd	1.0	PPB (UG/L)
Dibenzo (a,h) anthracene	nd	1.0	PPB (UG/L)
Benzo (g,h,i) perylene	nd	1.0	PPB (UG/L)

Hexadecane (Surrogate) Recovery = 96 %

Dilution Factor = 1

Results for sample: MW-4

Date collected: 10/4/94	Date received: 10/6/94
Date extracted: 10/11/94	Date analyzed: 10/11,16/94
Client: Daniel B. Stephens and Associates, Inc.	
Project Name: ENRON - Eunice	Heal #: 9410019-4
Project Manager: Bob Marley	Sampled by: BM/CP
Matrix: Aqueous	

Test: EPA 8015 Modified

Compound	Result	Detection Limit	Units
Gasoline	nd	0.05	PPM (MG/L)

BFB (Surrogate) Recovery = 99 %

Dilution Factor = 1

Test: EPA 8015 Modified

Compound	Result	Detection Limit	Units
Diesel	nd	1.0	PPM (MG/L)

DNOP (Surrogate) Recovery = 103 %

Dilution Factor = 1

Results for sample: MW-6

Date collected: 10/5/94	Date received: 10/6/94
Date extracted: NA	Date analyzed: 10/13/94
Client: Daniel B. Stephens and Associates, Inc.	
Project Name: ENRON - Eunice	HEAL #: 9410019-5
Project Manager: Bob Marley	Sampled by: BM/CP
Matrix: Aqueous	

Test: EPA 8010/8020

Analyte:	Results	Detection Limit	Units
Benzene	0.7	0.5	PPB (UG/L)
Bromodichloromethane	nd	0.2	PPB (UG/L)
Bromoform	nd	1.0	PPB (UG/L)
Bromomethane	nd	1.0	PPB (UG/L)
Carbon Tetrachloride	nd	0.2	PPB (UG/L)
Chlorobenzene	nd	0.2	PPB (UG/L)
Chloroethane	nd	0.2	PPB (UG/L)
Chloroform	nd	0.2	PPB (UG/L)
Chloromethane	nd	0.2	PPB (UG/L)
2-Chloroethylvinyl Ether	nd	1.0	PPB (UG/L)
Dibromochloromethane	nd	0.2	PPB (UG/L)
1,3-Dichlorobenzene	nd	0.2	PPB (UG/L)
1,2-Dichlorobenzene	nd	0.2	PPB (UG/L)
1,4-Dichlorobenzene	nd	0.2	PPB (UG/L)
Dichlorodifluoromethane	nd	0.2	PPB (UG/L)
1,1-Dichloroethane	nd	0.2	PPB (UG/L)
1,2-Dichloroethane	nd	0.2	PPB (UG/L)
1,1-Dichloroethene	nd	0.2	PPB (UG/L)
1,2-Dichloroethene (Cis)	nd	0.2	PPB (UG/L)
1,2-Dichloroethene (Trans)	nd	0.2	PPB (UG/L)
1,2-Dichloropropane	nd	0.2	PPB (UG/L)
cis-1,3-Dichloropropene	nd	0.2	PPB (UG/L)
trans-1,3-Dichloropropene	nd	0.2	PPB (UG/L)
Ethylbenzene	nd	0.5	PPB (UG/L)
Dichloromethane	nd	2.0	PPB (UG/L)
1,1,2,2-Tetrachloroethane	nd	0.2	PPB (UG/L)
Tetrachloroethene (PCE)	nd	0.2	PPB (UG/L)
Toluene	nd	0.5	PPB (UG/L)
1,1,1-Trichloroethane	nd	0.2	PPB (UG/L)
1,1,2-Trichloroethane	nd	0.2	PPB (UG/L)
Trichloroethene (TCE)	nd	0.2	PPB (UG/L)
Vinyl Chloride	nd	0.2	PPB (UG/L)
Xylenes (Total)	nd	0.5	PPB (UG/L)
Trichlorofluoromethane	nd	0.2	PPB (UG/L)
MTBE	nd	2.5	PPB (UG/L)

BFB (Surrogate) Recovery = 88 %
BCM (Surrogate) Recovery = 95 %
Dilution Factor = 1

Results for sample: MW-6

Date collected: 10/5/94	Date received: 10/6/94
Date extracted: 10/10/94	Date analyzed: 10/15/94
Client: Daniel B. Stephens and Associates, Inc.	
Project Name: ENRON - Eunice	Heal #: 9410019-5
Project Manager: Bob Marley	Sampled by: BM/CP
Matrix: Aqueous	

Test: EPA 8100

Compound	Result	Detection limit	Units
Naphthalene	nd	0.5	PPB (UG/L)
2-Methyl Naphthalene	nd	0.5	PPB (UG/L)
1-Methyl Naphthalene	nd	0.5	PPB (UG/L)
Acenaphthalene	nd	0.5	PPB (UG/L)
Acenaphthene	0.7	0.5	PPB (UG/L)
Fluorene	nd	0.5	PPB (UG/L)
Phenanthrene	nd	0.5	PPB (UG/L)
Anthracene	nd	0.5	PPB (UG/L)
Fluoranthrene	nd	0.5	PPB (UG/L)
Pyrene	nd	0.5	PPB (UG/L)
Benzo (a) anthracene	nd	0.5	PPB (UG/L)
Chrysene	nd	0.5	PPB (UG/L)
Benzo (b) fluoranthene	nd	0.5	PPB (UG/L)
Benzo (k) fluoranthene	nd	0.5	PPB (UG/L)
Benzo (a) pyrene	nd	0.5	PPB (UG/L)
Indeno (1,2,3-cd) pyrene	nd	1.0	PPB (UG/L)
Dibenzo (a,h) anthracene	nd	1.0	PPB (UG/L)
Benzo (g,h,i) perylene	nd	1.0	PPB (UG/L)

Hexadecane (Surrogate) Recovery = 83 %

Dilution Factor = 1

Results for sample: MW-6

Date collected: 10/5/94	Date received: 10/6/94
Date extracted: 10/11/94	Date analyzed: 10/11,16/94
Client: Daniel B. Stephens and Associates, Inc.	
Project Name: ENRON - Eunice	Heal #: 9410019-5
Project Manager: Bob Marley	Sampled by: BM/CP
Matrix: Aqueous	

Test: EPA 8015 Modified

Compound	Result	Detection Limit	Units
Gasoline	nd	0.05	PPM (MG/L)

BFB (Surrogate) Recovery = 99 %

Dilution Factor = 1

Test: EPA 8015 Modified

Compound	Result	Detection Limit	Units
Diesel	nd	1.0	PPM (MG/L)

DNOP (Surrogate) Recovery = 73 %

Dilution Factor = 1

Hall Environmental Analysis Laboratory

Hall Environmental Analysis Laboratory
2403 San Mateo NE, Suite P-13
Albuquerque, NM 87110

10/17/94

Daniel B. Stephens and Associates, Inc.
6020 Academy NE, Suite 100
Albuquerque, NM 87109

Dear Mr. Bob Marley,

Enclosed are the results for the analyses that were requested. These were done according to EPA procedures or the equivalent.

Detection limits are determined by EPA methodology. Unless noted on sample page, all criteria for QA/QC acceptance levels fall within established parameters. These parameters are modeled from the EPA-600 14-79 019, March 1979, "Handbook for Analytical Quality Control in Water and Waste Water."

Please don't hesitate to contact me for any additional information or clarifications

Sincerely,

Scott Hallenbeck 10/21/94

Scott Hallenbeck, Lab Manager

Project: ENRON - Eunice

Results for sample: MW-5

Date collected: 10/6/94	Date received: 10/10/94
Date extracted: NA	Date analyzed: 10/15/94
Client: Daniel B. Stephens and Associates, Inc.	
Project Name: ENRON - Eunice	HEAL #: 9410026-1
Project Manager: Bob Marley	Sampled by: BM/CP
Matrix: Aqueous	

Test: EPA 8010/8020

Analyte:	Results	Detection Limit	Units
Benzene	70	0.5	PPB (UG/L)
Bromodichloromethane	nd	0.2	PPB (UG/L)
Bromoform	nd	1.0	PPB (UG/L)
Bromomethane	nd	1.0	PPB (UG/L)
Carbon Tetrachloride	nd	0.2	PPB (UG/L)
Chlorobenzene	nd	0.2	PPB (UG/L)
Chloroethane	nd	0.2	PPB (UG/L)
Chloroform	nd	0.2	PPB (UG/L)
Chloromethane	nd	0.2	PPB (UG/L)
2-Chloroethylvinyl Ether	nd	1.0	PPB (UG/L)
Dibromochloromethane	nd	0.2	PPB (UG/L)
1,3-Dichlorobenzene	nd	0.2	PPB (UG/L)
1,2-Dichlorobenzene	nd	0.2	PPB (UG/L)
1,4-Dichlorobenzene	nd	0.2	PPB (UG/L)
Dichlorodifluoromethane	nd	0.2	PPB (UG/L)
1,1-Dichloroethane	nd	0.2	PPB (UG/L)
1,2-Dichloroethane	nd	0.2	PPB (UG/L)
1,1-Dichloroethene	nd	0.2	PPB (UG/L)
1,2-Dichloroethene (Cis)	nd	0.2	PPB (UG/L)
1,2-Dichloroethene (Trans)	nd	0.2	PPB (UG/L)
1,2-Dichloropropane	nd	0.2	PPB (UG/L)
cis-1,3-Dichloropropene	nd	0.2	PPB (UG/L)
trans-1,3-Dichloropropene	nd	0.2	PPB (UG/L)
Ethylbenzene	44	0.5	PPB (UG/L)
Dichloromethane	nd	2.0	PPB (UG/L)
1,1,2,2-Tetrachloroethane	nd	0.2	PPB (UG/L)
Tetrachloroethene (PCE)	nd	0.2	PPB (UG/L)
Toluene	nd	0.5	PPB (UG/L)
1,1,1-Trichloroethane	nd	0.2	PPB (UG/L)
1,1,2-Trichloroethane	nd	0.2	PPB (UG/L)
Trichloroethene (TCE)	nd	0.2	PPB (UG/L)
Vinyl Chloride	nd	0.2	PPB (UG/L)
Xylenes (Total)	0.9	0.5	PPB (UG/L)
Trichlorofluoromethane	nd	0.2	PPB (UG/L)
MTBE	nd	2.5	PPB (UG/L)

BFB (Surrogate) Recovery = 100 %
BCM (Surrogate) Recovery = 90 %
Dilution Factor = 1

Results for sample: MW-5

Date collected: 10/6/94	Date received: 10/10/94
Date extracted: 10/12/94	Date analyzed: 10/15/94
Client: Daniel B. Stephens and Associates, Inc.	
Project Name: ENRON - Eunice	Heal #: 9410026-1
Project Manager: Bob Marley	Sampled by: BM/CP
Matrix: Aqueous	

Test: EPA 8100

Compound	Result	Detection limit	Units
Naphthalene	0.5	0.5	PPB (UG/L)
2-Methyl Naphthalene	nd	0.5	PPB (UG/L)
1-Methyl Naphthalene	nd	0.5	PPB (UG/L)
Acenaphthalene	nd	0.5	PPB (UG/L)
Acenaphthene	0.8	0.5	PPB (UG/L)
Fluorene	nd	0.5	PPB (UG/L)
Phenanthrene	nd	0.5	PPB (UG/L)
Anthracene	nd	0.5	PPB (UG/L)
Fluoranthrene	nd	0.5	PPB (UG/L)
Pyrene	nd	0.5	PPB (UG/L)
Benzo (a) anthracene	nd	0.5	PPB (UG/L)
Chrysene	nd	0.5	PPB (UG/L)
Benzo (b) fluoranthene	nd	0.5	PPB (UG/L)
Benzo (k) fluoranthene	nd	0.5	PPB (UG/L)
Benzo (a) pyrene	nd	0.5	PPB (UG/L)
Indeno (1,2,3-cd) pyrene	nd	1.0	PPB (UG/L)
Dibenzo (a,h) anthracene	nd	1.0	PPB (UG/L)
Benzo (g,h,i) perylene	nd	1.0	PPB (UG/L)

Hexadecane (Surrogate) Recovery = 80 %

Dilution Factor = 1

Results for sample: MW-5

Date collected: 10/6/94	Date received: 10/10/94
Date extracted: 10/12/94	Date analyzed: 10/12,16/94
Client: Daniel B. Stephens and Associates, Inc.	
Project Name: ENRON - Eunice	Heal #: 9410026-1
Project Manager: Bob Marley	Sampled by: BM/CP
Matrix: Aqueous	

Test: EPA 8015 Modified

Compound	Result	Detection Limit	Units
Gasoline	0.27	0.05	PPM (MG/L)

BFB (Surrogate) Recovery = 118 %

Dilution Factor = 1

Test: EPA 8015 Modified

Compound	Result	Detection Limit	Units
Diesel	nd	1.0	PPM (MG/L)

DNOP (Surrogate) Recovery = 96 %

Dilution Factor = 1

Results for sample: MW-7

Date collected: 10/7/94	Date received: 10/10/94
Date extracted: NA	Date analyzed: 10/15/94
Client: Daniel B. Stephens and Associates, Inc.	
Project Name: ENRON - Eunice	HEAL #: 9410026-2
Project Manager: Bob Marley	Sampled by: BM/CP
Matrix: Aqueous	

Test: EPA 8010/8020

Analyte:	Results	Detection Limit	Units
Benzene	8.1	0.5	PPB (UG/L)
Bromodichloromethane	nd	0.2	PPB (UG/L)
Bromoform	nd	1.0	PPB (UG/L)
Bromomethane	nd	1.0	PPB (UG/L)
Carbon Tetrachloride	nd	0.2	PPB (UG/L)
Chlorobenzene	nd	0.2	PPB (UG/L)
Chloroethane	nd	0.2	PPB (UG/L)
Chloroform	nd	0.2	PPB (UG/L)
Chloromethane	nd	0.2	PPB (UG/L)
2-Chloroethylvinyl Ether	nd	1.0	PPB (UG/L)
Dibromochloromethane	nd	0.2	PPB (UG/L)
1,3-Dichlorobenzene	nd	0.2	PPB (UG/L)
1,2-Dichlorobenzene	nd	0.2	PPB (UG/L)
1,4-Dichlorobenzene	nd	0.2	PPB (UG/L)
Dichlorodifluoromethane	nd	0.2	PPB (UG/L)
1,1-Dichloroethane	nd	0.2	PPB (UG/L)
1,2-Dichloroethane	nd	0.2	PPB (UG/L)
1,1-Dichloroethene	nd	0.2	PPB (UG/L)
1,2-Dichloroethene (Cis)	nd	0.2	PPB (UG/L)
1,2-Dichloroethene (Trans)	nd	0.2	PPB (UG/L)
1,2-Dichloropropane	nd	0.2	PPB (UG/L)
cis-1,3-Dichloropropene	nd	0.2	PPB (UG/L)
trans-1,3-Dichloropropene	nd	0.2	PPB (UG/L)
Ethylbenzene	42	0.5	PPB (UG/L)
Dichloromethane	nd	2.0	PPB (UG/L)
1,1,2,2-Tetrachloroethane	nd	0.2	PPB (UG/L)
Tetrachloroethene (PCE)	nd	0.2	PPB (UG/L)
Toluene	nd	0.5	PPB (UG/L)
1,1,1-Trichloroethane	nd	0.2	PPB (UG/L)
1,1,2-Trichloroethane	nd	0.2	PPB (UG/L)
Trichloroethene (TCE)	nd	0.2	PPB (UG/L)
Vinyl Chloride	nd	0.2	PPB (UG/L)
Xylenes (Total)	99	0.5	PPB (UG/L)
Trichlorofluoromethane	nd	0.2	PPB (UG/L)
MTBE	nd	2.5	PPB (UG/L)

BFB (Surrogate) Recovery = 86 %
BCM (Surrogate) Recovery = 101 %
Dilution Factor = 1

Results for sample: MW-7

Date collected: 10/7/94	Date received: 10/10/94
Date extracted: 10/12/94	Date analyzed: 10/15/94
Client: Daniel B. Stephens and Associates, Inc.	
Project Name: ENRON - Eunice	Heal #: 9410026-2
Project Manager: Bob Marley	Sampled by: BM/CP
Matrix: Aqueous	

Test: EPA 8100

Compound	Result	Detection limit	Units
Naphthalene	0.7	0.5	PPB (UG/L)
2-Methyl Naphthalene	1.9	0.5	PPB (UG/L)
1-Methyl Naphthalene	0.9	0.5	PPB (UG/L)
Acenaphthalene	nd	0.5	PPB (UG/L)
Acenaphthene	0.6	0.5	PPB (UG/L)
Fluorene	nd	0.5	PPB (UG/L)
Phenanthrene	nd	0.5	PPB (UG/L)
Anthracene	nd	0.5	PPB (UG/L)
Fluoranthrene	nd	0.5	PPB (UG/L)
Pyrene	nd	0.5	PPB (UG/L)
Benzo (a) anthracene	nd	0.5	PPB (UG/L)
Chrysene	nd	0.5	PPB (UG/L)
Benzo (b) fluoranthene	nd	0.5	PPB (UG/L)
Benzo (k) fluoranthene	nd	0.5	PPB (UG/L)
Benzo (a) pyrene	nd	0.5	PPB (UG/L)
Indeno (1,2,3-cd) pyrene	nd	1.0	PPB (UG/L)
Dibenzo (a,h) anthracene	nd	1.0	PPB (UG/L)
Benzo (g,h,i) perylene	nd	1.0	PPB (UG/L)

Hexadecane (Surrogate) Recovery = 83 %

Dilution Factor = 1

Results for sample: MW-7

Date collected: 10/7/94	Date received: 10/10/94
Date extracted: 10/12/94	Date analyzed: 10/12,16/94
Client: Daniel B. Stephens and Associates, Inc.	
Project Name: ENRON - Eunice	Heal #: 9410026-2
Project Manager: Bob Marley	Sampled by: BM/CP
Matrix: Aqueous	

Test: EPA 8015 Modified

Compound	Result	Detection Limit	Units
Gasoline	1.2	0.05	PPM (MG/L)

BFB (Surrogate) Recovery = 107 %

Dilution Factor = 1

Test: EPA 8015 Modified

Compound	Result	Detection Limit	Units
Diesel	nd	1.0	PPM (MG/L)

DNOP (Surrogate) Recovery = 129

Dilution Factor = 1

Analytical Technologies, Inc.

2709-D Pan American Freeway, NE Albuquerque, NM 87107
Phone (505) 344-3777 FAX (505) 344-4413

RECEIVED NOV 3 1994

ATI I.D. **410353**

November 2, 1994

Daniel B. Stephens & Assoc.
6020 Academy NE, Suite 100
Albuquerque, NM 87109

Project Name/Number: ENRON-EUNICE 4215

Attention: Bob Marley

On **10/10/94**, Analytical Technologies, Inc., (ADHS License No. AZ0015), received a request to analyze **aqueous** samples. The samples were analyzed with EPA methodology or equivalent methods. The results of these analyses and the quality control data, which follow each set of analyses, are enclosed.

Low matrix spike recovery by EPA Method for mercury (sample MW-7) was confirmed by re-digestion and analysis.

Due to matrix interferences, cadmium spike analysis was performed using the Method of Standard Additions (MSA). The spike result given is the correlation coefficient (CC), which is ≥ 0.995.

Due to matrix interferences, mercury analysis of sample MW-7 and cadmium analysis of sample MW-5 were performed at a dilution. The reporting limits have been raised accordingly.

The sample used for cadmium QC analyses was analyzed at a 5X dilution. The relative percent difference (RPD) for quality control duplicate analyses meets ATI acceptance criteria; the results are <5X the reporting limit.

All analyses were performed by Analytical Technologies, Inc., 9830 S. 51st Street, Suite B-113, Phoenix, AZ.

If you have any questions or comments, please do not hesitate to contact us at (505) 344-3777.

Letitia Krakowski, Ph.D.
Project Manager

H. Mitchell Rubenstein, Ph.D.
Laboratory Manager

MR:jt

Enclosure

Analytical Technologies, Inc.

CLIENT : D.B. STEPHENS & ASSOCIATES
PROJECT # : 4215
PROJECT NAME : ENRON-EUNICE
ATI I.D. : 410353

DATE RECEIVED : 10/10/94
REPORT DATE : 11/02/94

ATI #	CLIENT DESCRIPTION	MATRIX	DATE COLLECTED
01	MW-5	AQUEOUS	10/06/94
02	MW-7	AQUEOUS	10/07/94
03	MW-99	AQUEOUS	10/06/94

----- TOTALS -----

MATRIX	# SAMPLES
AQUEOUS	3

ATI STANDARD DISPOSAL PRACTICE

The samples from this project will be disposed of in thirty (30) days from the date of this report. If an extended storage period is required, please contact our sample control department before the scheduled disposal date.

Analytical Technologies, Inc.

GENERAL CHEMISTRY RESULTS

ATI I.D. : 410353

CLIENT : D.B. STEPHENS & ASSOCIATES
PROJECT # : 4215
PROJECT NAME : ENRON-EUNICE

DATE RECEIVED : 10/10/94
REPORT DATE : 11/01/94

PARAMETER	UNITS	01	02	03
CARBONATE (CACO3)	MG/L	36	<1	-
BICARBONATE (CACO3)	MG/L	767	433	-
HYDROXIDE (CACO3)	MG/L	<1	<1	-
TOTAL ALKALINITY (AS CACO3)	MG/L	803	433	-
CHLORIDE (EPA 325.2)	MG/L	2400	2100	2400
NO2/NO3-N, TOTAL (353.2)	MG/L	0.08	<0.06	0.08
SULFATE (EPA 375.2)	MG/L	9	<5	8
T. DISSOLVED SOLIDS (160.1)	MG/L	4700	4000	4600

Analytical Technologies, Inc.

GENERAL CHEMISTRY - QUALITY CONTROL

CLIENT : D.B. STEPHENS & ASSOCIATES
PROJECT # : 4215
PROJECT NAME : ENRON-EUNICE ATI I.D. : 410353

PARAMETER	UNITS	ATI I.D.	SAMPLE RESULT	DUP. RESULT	RPD	SPIKED SAMPLE	SPIKE CONC	% REC
CARBONATE	MG/L	41064202	<1	<1	NA	NA	NA	NA
BICARBONATE	MG/L		183	185	1	NA	NA	NA
HYDROXIDE	MG/L		<1	<1	NA	NA	NA	NA
TOTAL ALKALINITY	MG/L		183	185	1	NA	NA	NA
CHLORIDE	MG/L	41034541	4.2	4.3	2	14.5	10.0	103
NITRITE/NITRATE-N (TOT	MG/L	41049910	<0.06	<0.06	NA	2.01	2.00	100
SULFATE	MG/L	41033501	<5	<5	NA	18	20	90
TOTAL DISSOLVED SOLIDS	MG/L	41035303	4600	4700	2	NA	NA	NA

$$\% \text{ Recovery} = \frac{(\text{Spike Sample Result} - \text{Sample Result})}{\text{Spike Concentration}} \times 100$$

$$\text{RPD (Relative Percent Difference)} = \frac{(\text{Sample Result} - \text{Duplicate Result})}{\text{Average Result}} \times 100$$

Analytical Technologies, Inc.

METALS RESULTS

ATI I.D. : 410353

CLIENT : D.B. STEPHENS & ASSOCIATES
PROJECT # : 4215
PROJECT NAME : ENRON-EUNICE

DATE RECEIVED : 10/10/94
REPORT DATE : 11/01/94

PARAMETER	UNITS	01	02	03
SILVER (EPA 200.7/6010)	MG/L	<0.010	<0.010	-
ARSENIC (EPA 206.2/7060)	MG/L	0.027	0.012	-
BARIUM (EPA 200.7/6010)	MG/L	0.934	9.72	-
CALCIUM (EPA 200.7/6010)	MG/L	16.1	129	-
CADMIUM (EPA 213.2/7131)	MG/L	<0.0025	<0.0005	-
CHROMIUM (EPA 200.7/6010)	MG/L	<0.010	<0.010	-
COPPER (EPA 200.7/6010)	MG/L	<0.010	<0.010	-
IRON (EPA 200.7/6010)	MG/L	0.047	<0.020	0.048
MERCURY (EPA 245.1/7470)	MG/L	<0.0002	<0.0010	-
POTASSIUM (EPA 200.7/6010)	MG/L	20.1	8.5	-
MAGNESIUM (EPA 200.7/6010)	MG/L	29.7	162	-
MANGANESE (EPA 200.7/6010)	MG/L	0.020	0.100	0.020
SODIUM (EPA 200.7/6010)	MG/L	1840	1130	-
LEAD (EPA 239.2/7421)	MG/L	<0.002	<0.002	-
SELENIUM (EPA 270.2/7740)	MG/L	<0.005	<0.005	-
ZINC (EPA 200.7/6010)	MG/L	<0.020	<0.020	-

Analytical Technologies, Inc.

METALS - QUALITY CONTROL

CLIENT : D.B. STEPHENS & ASSOCIATES
PROJECT # : 4215
PROJECT NAME : ENRON-EUNICE ATI I.D. : 410353

PARAMETER	UNITS	ATI I.D.	SAMPLE RESULT	DUP. RESULT	RPD	SPIKED SAMPLE	SPIKE CONC	% REC
SILVER	MG/L	41063402	<0.010	<0.010	NA	0.399	0.500	80
ARSENIC	MG/L	41063402	<0.005	<0.005	NA	0.047	0.050	94
BARIUM	MG/L	41058801	0.157	0.148	6	1.19	1.00	103
CALCIUM	MG/L	41058801	29.0	28.8	0.7	78.5	50.0	99
CADMIUM	MG/L	41063402	0.0069	0.0056	21	MSA	CC =	.9978
CHROMIUM	MG/L	41058801	<0.010	<0.010	NA	1.07	1.00	107
COPPER	MG/L	41058801	<0.010	<0.010	NA	0.534	0.500	107
IRON	MG/L	41035301	0.047	0.038	21	0.913	1.00	87
MERCURY	MG/L	41049905	<0.0002	<0.0002	NA	0.0047	0.0050	94
MERCURY	MG/L	41035302	<0.0010	<0.0010	NA	0.0205	0.0250	82*
POTASSIUM	MG/L	41058801	12.8	12.6	2	58.8	50.0	92
MAGNESIUM	MG/L	41058801	17.0	16.8	1	40.6	25.0	94
MANGANESE	MG/L	41058801	0.021	0.019	10	1.09	1.00	107
SODIUM	MG/L	41058801	64.0	63.3	1	107	50.0	86
LEAD	MG/L	41063402	<0.002	<0.002	NA	0.035	0.050	70
SELENIUM	MG/L	41063402	<0.005	<0.005	NA	0.025	0.050	50
ZINC	MG/L	41063402	1.54	1.64	6	11.3	10.0	98

$$\% \text{ Recovery} = \frac{(\text{Spike Sample Result} - \text{Sample Result})}{\text{Spike Concentration}} \times 100$$

$$\text{RPD (Relative Percent Difference)} = \frac{(\text{Sample Result} - \text{Duplicate Result})}{\text{Average Result}} \times 100$$

* Result out of limits due to sample matrix interference

Analytical Technologies, Inc.

2709-D Pan American Freeway, NE Albuquerque, NM 87107
Phone (505) 344-3777 FAX (505) 344-4413

ATI I.D. **410335**

October 28, 1994

Daniel B. Stephens & Associates
6020 Academy NE Suite 100
Albuquerque, NM 87109

Project Name/Number: ENRON-EUNICE 4215

Attention: Bob Marley

On **10/06/94**, Analytical Technologies, Inc., (ADHS License No. AZ0015), received a request to analyze **aqueous** samples. The samples were analyzed with EPA methodology or equivalent methods. The results of these analyses and the quality control data, which follow each set of analyses, are enclosed.

Low matrix spike recovery for mercury (sample 410335-03) was confirmed by re-digestion and analysis.

All analyses were performed by Analytical Technologies, Inc., 9830 S. 51st Street, Suite B-113, Phoenix, AZ.

If you have any questions or comments, please do not hesitate to contact us at (505) 344-3777.

Letitia Krakowski, Ph.D.
Project Manager

H. Mitchell Rubenstein, Ph.D.
Laboratory Manager

MR:jt

Enclosure

Analytical Technologies, Inc.

CLIENT : D.B. STEPHENS & ASSOCIATES
PROJECT # : 4215
PROJECT NAME : ENRON-EUNICE
ATI I.D. : 410335

DATE RECEIVED : 10/06/94
REPORT DATE : 10/28/94

ATI #	CLIENT DESCRIPTION	MATRIX	DATE COLLECTED
01	MW-1	AQUEOUS	10/03/94
02	MW-3	AQUEOUS	10/03/94
03	MW-2	AQUEOUS	10/03/94
04	MW-4	AQUEOUS	10/04/94
05	MW-6	AQUEOUS	10/05/94

----- TOTALS -----

MATRIX	# SAMPLES
AQUEOUS	5

ATI STANDARD DISPOSAL PRACTICE

The samples from this project will be disposed of in thirty (30) days from the date of this report. If an extended storage period is required, please contact our sample control department before the scheduled disposal date.

Analytical Technologies, Inc.

GENERAL CHEMISTRY RESULTS

ATI I.D. : 410335

CLIENT : D.B. STEPHENS & ASSOCIATES
PROJECT # : 4215
PROJECT NAME : ENRON-EUNICE

DATE RECEIVED : 10/06/94
REPORT DATE : 10/28/94

PARAMETER	UNITS	01	02	03	04	05
CARBONATE (CACO3)	MG/L	<1	<1	<1	<1	<1
BICARBONATE (CACO3)	MG/L	582	794	1110	510	576
HYDROXIDE (CACO3)	MG/L	<1	<1	<1	<1	<1
TOTAL ALKALINITY (AS CACO3)	MG/L	582	794	1110	510	576
CHLORIDE (EPA 325.2)	MG/L	750	620	3000	940	2100
NO2/NO3-N, TOTAL (353.2)	MG/L	<0.06	<0.06	<0.06	<0.06	<0.06
SULFATE (EPA 375.2)	MG/L	<5	20	20	<5	<5
T. DISSOLVED SOLIDS (160.1)	MG/L	1700	2800	5900	2000	4000

Analytical Technologies, Inc.

GENERAL CHEMISTRY - QUALITY CONTROL

CLIENT : D.B. STEPHENS & ASSOCIATES
PROJECT # : 4215
PROJECT NAME : ENRON-EUNICE ATI I.D. : 410335

PARAMETER	UNITS	ATI I.D.	SAMPLE RESULT	DUP. RESULT	RPD	SPIKED SAMPLE	SPIKE CONC	% REC
CARBONATE	MG/L	41053215	<1	<1	NA	NA	NA	NA
BICARBONATE	MG/L		350	350	0	NA	NA	NA
HYDROXIDE	MG/L		<1	<1	NA	NA	NA	NA
TOTAL ALKALINITY	MG/L		350	350	0	NA	NA	NA
CARBONATE	MG/L	41056703	<1	<1	NA	NA	NA	NA
BICARBONATE	MG/L		<1	<1	NA	NA	NA	NA
HYDROXIDE	MG/L		<1	<1	NA	NA	NA	NA
TOTAL ALKALINITY	MG/L		<1	<1	NA	NA	NA	NA
CARBONATE	MG/L	41063907	<1	<1	NA	NA	NA	NA
BICARBONATE	MG/L		585	584	0.2	NA	NA	NA
HYDROXIDE	MG/L		<1	<1	NA	NA	NA	NA
TOTAL ALKALINITY	MG/L		585	584	0.2	NA	NA	NA
CHLORIDE	MG/L	41057701	119	121	2	222	100	103
CHLORIDE	MG/L	41034541	4.2	4.3	2	14.5	10.0	103
NITRITE/NITRATE-N (TOT	MG/L	41033501	<0.06	<0.06	NA	2.00	2.00	100
SULFATE	MG/L	41033501	<5	<5	NA	18	20	90
SULFATE	MG/L	41063903	10	9	11	29	20	95
TOTAL DISSOLVED SOLIDS	MG/L	41049905	10000	10000	0	NA	NA	NA
TOTAL DISSOLVED SOLIDS	MG/L	41074501	5600	5500	2	NA	NA	NA

$$\% \text{ Recovery} = \frac{(\text{Spike Sample Result} - \text{Sample Result})}{\text{Spike Concentration}} \times 100$$

$$\text{RPD (Relative Percent Difference)} = \frac{(\text{Sample Result} - \text{Duplicate Result})}{\text{Average Result}} \times 100$$

Analytical Technologies, Inc.

METALS RESULTS

ATI I.D. : 410335

CLIENT : D.B. STEPHENS & ASSOCIATES
PROJECT # : 4215
PROJECT NAME : ENRON-EUNICE

DATE RECEIVED : 10/06/94
REPORT DATE : 10/28/94

PARAMETER	UNITS	01	02	03	04	05
SILVER (EPA 200.7/6010)	MG/L	<0.010	<0.010	<0.010	<0.010	<0.010
ARSENIC (EPA 206.2/7060)	MG/L	0.039	0.027	0.029	0.015	0.017
BARIUM (EPA 200.7/6010)	MG/L	1.52	5.01	1.33	0.445	0.997
CALCIUM (EPA 200.7/6010)	MG/L	133	77.2	96.2	89.9	54.6
CADMIUM (EPA 213.2/7131)	MG/L	<0.0005	<0.0005	0.0011	<0.0005	0.0012
CHROMIUM (EPA 200.7/6010)	MG/L	<0.010	<0.010	<0.010	<0.010	<0.010
COPPER (EPA 200.7/6010)	MG/L	<0.010	<0.010	<0.010	<0.010	<0.010
IRON (EPA 200.7/6010)	MG/L	2.26	16.9	0.345	<0.020	<0.020
MERCURY (EPA 245.1/7470)	MG/L	<0.0002	<0.0002	<0.0002	<0.0002	<0.0002
POTASSIUM (EPA 200.7/6010)	MG/L	3.1	4.8	5.8	6.5	12.2
MAGNESIUM (EPA 200.7/6010)	MG/L	119	42.1	98.2	68.8	59.8
MANGANESE (EPA 200.7/6010)	MG/L	0.058	1.48	0.262	0.206	0.065
SODIUM (EPA 200.7/6010)	MG/L	346	100	2120	626	1560
LEAD (EPA 239.2/7421)	MG/L	<0.002	0.003	<0.002	<0.002	<0.002
SELENIUM (EPA 270.2/7740)	MG/L	<0.005	<0.005	<0.005	<0.005	<0.005
ZINC (EPA 200.7/6010)	MG/L	<0.020	<0.020	<0.020	<0.020	<0.020

Analytical Technologies, Inc.

METALS - QUALITY CONTROL

CLIENT : D.B. STEPHENS & ASSOCIATES
PROJECT # : 4215
PROJECT NAME : ENRON-EUNICE ATI I.D. : 410335

PARAMETER	UNITS	ATI I.D.	SAMPLE RESULT	DUP. RESULT	RPD	SPIKED SAMPLE	SPIKE CONC	% REC
SILVER	MG/L	41033504	<0.010	<0.010	NA	0.433	0.500	87
ARSENIC	MG/L	41057701	0.006	0.007	15	0.056	0.050	100
BARIUM	MG/L	41033504	0.445	0.445	0	1.34	1.00	90
CALCIUM	MG/L	41057701	70.3	68.7	2	117	50.0	93
CADMIUM	MG/L	41057701	<0.0005	<0.0005	NA	0.0048	0.0050	96
CHROMIUM	MG/L	41033504	<0.010	<0.010	NA	0.905	1.00	90
COPPER	MG/L	41033504	<0.010	<0.010	NA	0.463	0.500	93
IRON	MG/L	41033504	<0.020	<0.020	NA	0.980	1.00	98
MERCURY	MG/L	41049901	<0.0002	<0.0002	NA	0.0049	0.0050	98
MERCURY	MG/L	41033503	<0.0002	<0.0002	NA	0.0032	0.0050	64*
POTASSIUM	MG/L	41057701	4.6	4.6	0	50.7	50.0	92
MAGNESIUM	MG/L	41057701	9.2	8.9	3	32.6	25.0	94
MANGANESE	MG/L	41033504	0.206	0.206	0	1.13	1.00	92
SODIUM	MG/L	41057701	108	104	4	156	50.0	96
LEAD	MG/L	41057701	0.007	0.008	13	0.059	0.050	104
SELENIUM	MG/L	41057601	<0.005	<0.005	NA	0.030	0.050	60
ZINC	MG/L	41033504	<0.020	<0.020	NA	0.476	0.500	95

$$\% \text{ Recovery} = \frac{(\text{Spike Sample Result} - \text{Sample Result})}{\text{Spike Concentration}} \times 100$$

$$\text{RPD (Relative Percent Difference)} = \frac{(\text{Sample Result} - \text{Duplicate Result})}{\text{Average Result}} \times 100$$

* Result out of limits due to sample matrix interference

ENRON
OPERATIONS CORP.

P. O. Box 1188 Houston, Texas 77251-1188 (713) 853-6161

September 19, 1994

Mr. William C. Olson
Environmental Bureau
New Mexico Oil Conservation Division
P.O. Box 2088
Santa Fe, New Mexico 87504-2088

RE: Soil and Ground Water Investigation
Eunice Compressor Station
Lea County, New Mexico

Dear Bill,

Enclosed are two copies of a work plan for the subject facility. The work plan outlines Northern Natural Gas Company's (NNG) intended activities associated with the disposal of approximately 2000 cubic yards of stockpiled soil containing elevated TPH concentrations and the further delineation of petroleum hydrocarbons in subsurface soil and ground water beneath the facility. NNG will implement the work plan within thirty days of approval by the NMOCD.

If you have any questions regarding this work plan, please contact me at (713) 646-7644 or George Robinson at (713) 646-7327.

Sincerely,

Bill Kendrick

Bill Kendrick
Manager, Projects Group

gcr/BK

bc:	M. Terraso	ENRON Operations Corp.	Houston, TX
	L. Kunkel	Transwestern Pipeline Co.	Roswell, NM
	L. Campbell	Transwestern Pipeline Co.	Roswell, NM
	L. Soldano	ENRON Operations Corp.	Houston, TX
	G. Moya	Transwestern Pipeline Co.	Eunice CS, NM
	G. Robinson	Cypress Engineering Services	Houston, TX

WORK PLAN FOR SUBSURFACE INVESTIGATION
NORTHERN NATURAL GAS COMPRESSOR STATION
EUNICE, NEW MEXICO

1. INTRODUCTION

Daniel B. Stephens & Associates, Inc. (DBS&A) has prepared this work plan to investigate hydrocarbon-impacted soil and ground water underlying Northern Natural Gas Company's (NNG) Eunice Compressor Station, located approximately 5 miles south of Eunice, New Mexico (Figure 1). NNG is a subsidiary of ENRON Operations Corp. (EOC). The work plan presented herein is designed to complete the subsurface investigation work and, if possible, determine the potential source(s) responsible for the subsurface contamination detected during previous site investigations.

The compressor station, operated by Transwestern Pipeline Company (TPC), an EOC subsidiary, boosts the pressure of the natural gas stream originating from the adjoining Texaco gas plant. The gas plant was built in the late 1940s to extract the primary distillates (natural gasoline, butane, and propane) from the natural gas obtained from local gas production wells. In 1962, the compressor station was built to facilitate the delivery of dry natural gas to energy consumers in the Southwest.

Operation of the two facilities has resulted in the release of hydrocarbons and waste waters to the subsurface, primarily through the use of disposal pits, underground storage tanks (USTs), and aboveground storage tanks (ASTs). The pits and tanks are used for the management of waste liquids generated during routine facility operations, as described below:

- At the compressor station, waste liquids are generated by the removal of pipeline condensate and used lubricating oils from the pipeline and compressor engines. Currently, all waste liquids removed from the system are collected and stored in ASTs near the compressor building prior to off-site disposal.

T\4215\4215C00

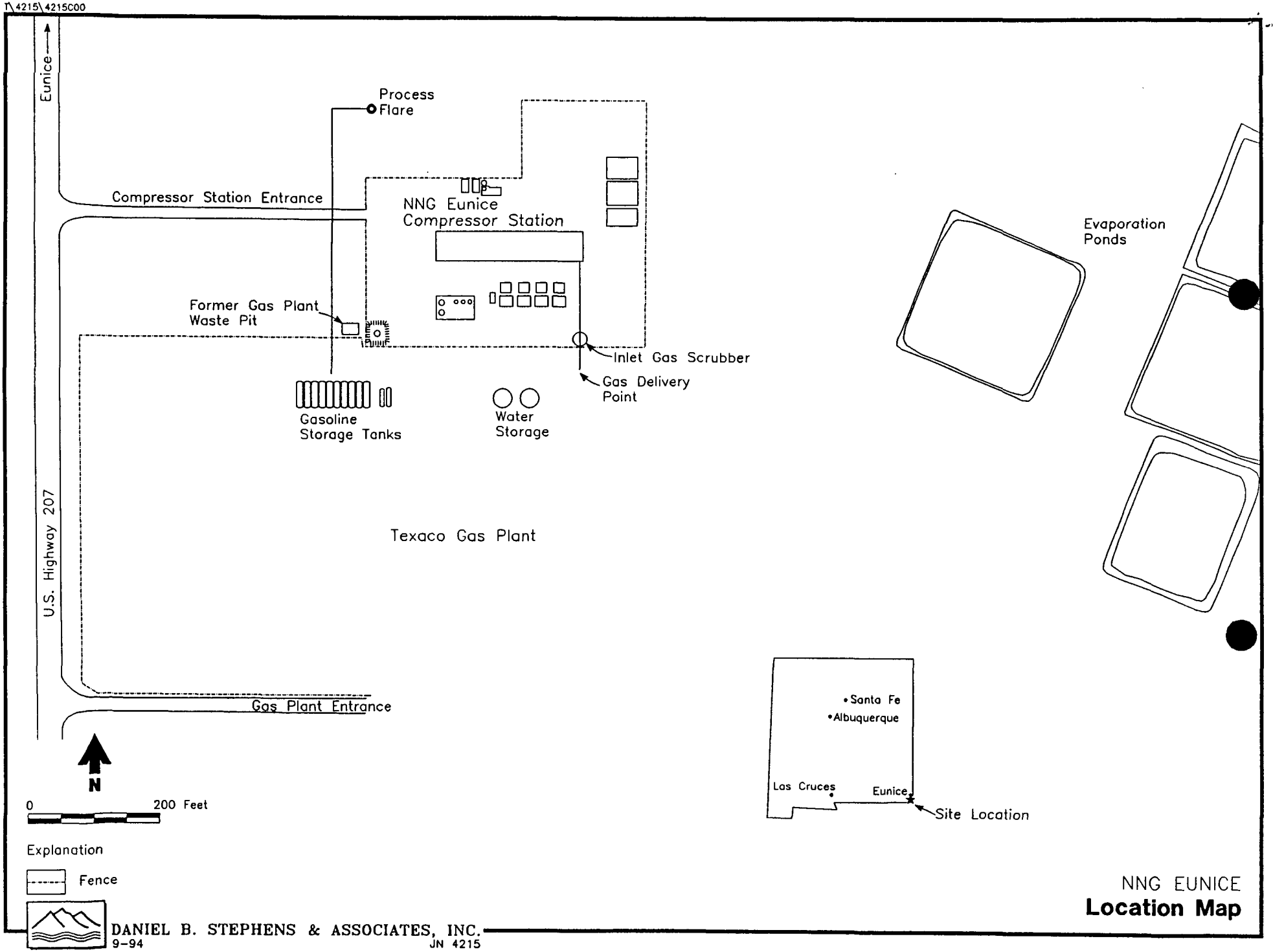


Figure 1

DANIEL B. STEPHENS & ASSOCIATES, INC.
9-94
JN 4215

NNG EUNICE
Location Map

- Along the compressor station's property boundaries, Texaco stores an assortment of natural gasolines, waste oils, and waste waters that have possibly contributed to the subsurface impacts detected at the compressor station. Past gas plant operations included the use of a drain pit near the current compressor building and the use of a waste pit near NNG's southwest property corner.

The purpose of this investigation is to assess the potential contributions from the former pipeline liquids AST, the former gas plant pits, and other potential off-site sources.

A detailed discussion of the proposed hydrogeologic investigation is provided in the following sections. Section 2 provides a summary of the previously completed work, including efforts to define the extent of subsurface impacts and corrective action completed by TPC. Section 3 describes the proposed scope of work, including field activities and report preparation.

2. PREVIOUS INVESTIGATIONS AND CORRECTIVE ACTION

Work previously completed at the NNG Eunice Compressor Station includes two hydrogeologic investigations conducted in 1991 and 1993, both of which are described in Section 2.1. In addition, TPC has initiated measures to remedy the impacted soil and to prevent further impacts to soil and ground water; these efforts are discussed in Section 2.2.

2.1 Previous Hydrogeologic Investigations

Two previous hydrogeologic investigations have identified impacts to the soil and ground-water underlying the site (Metric Corporation, 1991; Brown & Root Environmental, 1993). As discussed in these previous investigation reports, the site is underlain by unconsolidated and consolidated sandy limestone (caliche) and silty sand deposits, which regionally comprise the Ogallala Formation. The local depth to ground water, which occurs within the Ogallala Formation, is approximately 50 to 55 feet below ground surface (bgs). Regionally, ground-water flow is to the southeast; however, local recharge of waste water from the evaporation ponds located east of the facility and local ground-water pumping may alter the local flow field.

The first hydrogeologic investigation was performed by Metric Corporation in 1991. Metric advanced a total of 21 borings (BH-1 through BH-21) and installed 2 monitor wells (MW-1 and MW-2) in order to investigate subsurface conditions throughout the site. Of the 21 borings, 12 had a total depth of 4 feet or less. The remaining 9 borings were advanced to the water table to characterize soil contamination; these borings, two of which were completed as monitor wells 1 and 2, are shown on Figure 2.

Soil samples collected by Metric during drilling were analyzed for total recoverable petroleum hydrocarbons (TRPH) using EPA method 418.1 and for benzene, toluene, ethylbenzene, and xylene (BTEX) using EPA method 8020 modified. Samples recovered from the 4-foot borings contained high levels of petroleum hydrocarbons. Below the 4-foot depth, the regulatory guidelines set by the New Mexico Oil Conservation Division (OCD, 1993) for TPH and BTEX were exceeded only in soil boring BH-14, located near the former pipeline liquids AST (Figure 2). Further, total BTEX concentrations exceeded the 50-ppm criterion in only one of the samples collected from soil boring BH-14: the one collected at the water table. The analytical data suggest that minimal hydrocarbon mass is contained within the soil column above the water table; however, field organic vapor meter (OVM) readings using a flame ionization detector (FID) identified the presence of volatile organic compounds (VOCs) exceeding 1000 ppmv within six of the nine deep soil borings.

In addition, Metric analyzed ground-water samples for purgeable halocarbons and metals and soil samples for organics and metals using the toxic characteristic leaching procedure (TCLP). The purgeable halocarbon and TCLP analyses yielded concentrations below regulatory standards. However, ground-water samples did contain concentrations of barium, iron, lead, and manganese that exceeded the New Mexico Water Quality Control Commission (NMWQCC) standards.

During the spring of 1993, Brown & Root Environmental installed a third monitor well (MW-3 on Figure 2) and sampled each site monitor well for VOCs and semivolatile organic compounds (SVOCs) using gas chromatography/mass spectrometer (GC/MS) methods (EPA methods 8240 and 8270, respectively). Additional samples were collected for total dissolved solids (TDS) and metals analyses. NMWQCC standards exceeded in each well are outlined below:

T/4215/4215C01

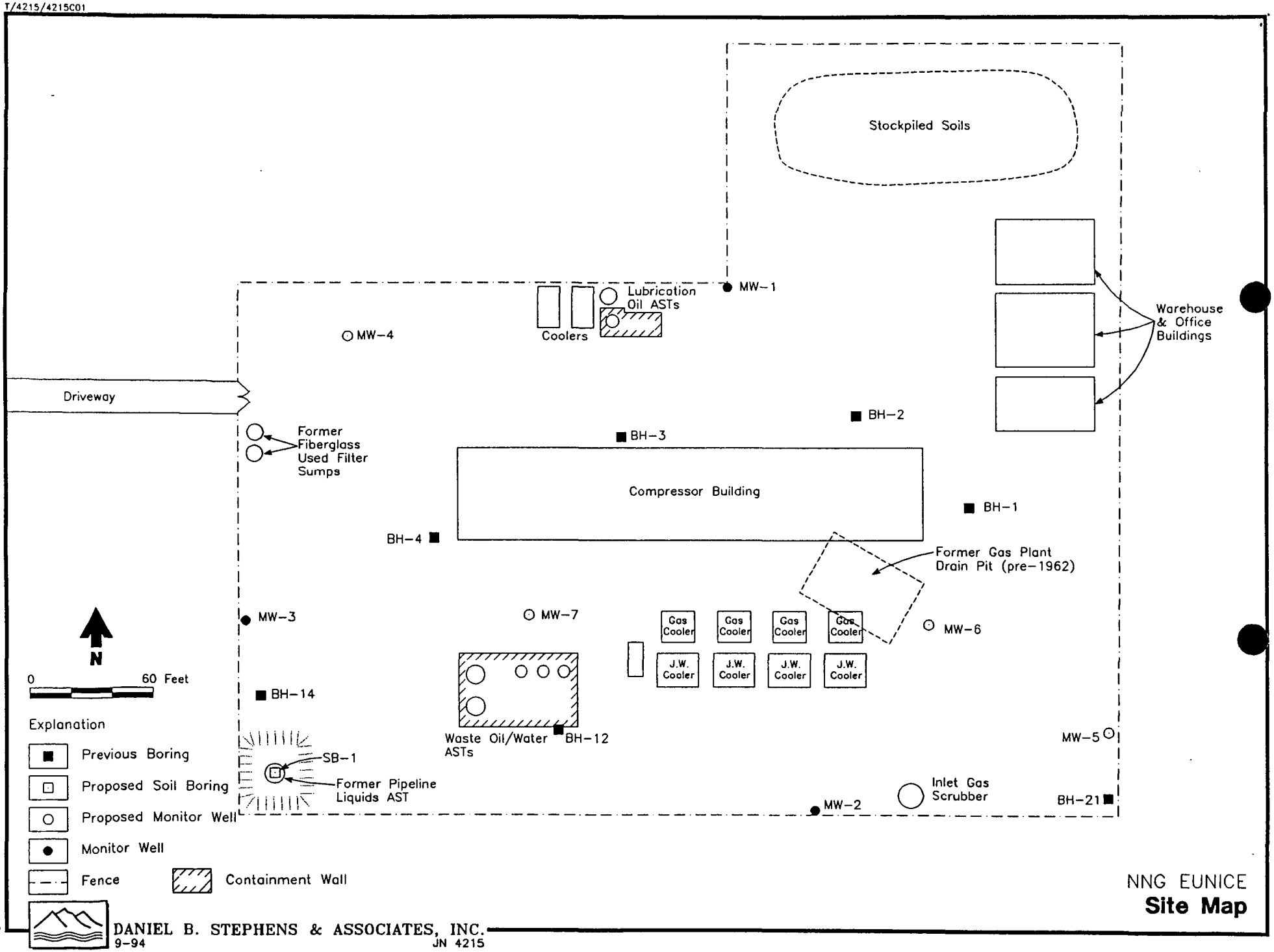


Figure 2

DANIEL B. STEPHENS & ASSOCIATES, INC.
9-94 JN 4215

NNG EUNICE
Site Map

- TDS and barium in monitor well MW-1
- Benzene, ethylbenzene, TDS, and barium in monitor well MW-2
- Benzene, toluene, naphthalene, TDS, and barium in monitor well MW-3

Based on the data collected to date, it appears that analytes exceeding NMWQCC and/or OCD standards are limited primarily to VOCs. Shallow soils containing high levels of TRPH (as identified by the 4-foot borings) were excavated by TPC (Section 2.2). The remaining high-TRPH soil concentrations appear to be limited to the former pipeline condensate AST area. Contaminant data collected from borings and monitor wells elsewhere at the compressor station have not substantiated additional sources.

2.2 Corrective Action

During the summer of 1993, TPC excavated hydrocarbon-contaminated soils near the southern and eastern sides of the compressor building, the former pipeline condensate AST, and the former lube oil and drain tanks beneath the compressor building. In general, these soils were excavated to a caliche layer present at approximately 4 feet bgs. TPC has also removed all below-grade sumps and drain tanks and replaced them with the new liquid waste ASTs depicted on Figure 2.

Approximately 2,000 cubic yards of soils were excavated during the corrective action undertaken by TPC. These soils are currently stockpiled within the northeastern portion of the site (Figure 2). Plans for the disposal of the hydrocarbon-contaminated soils are discussed in Section 3.

3. SCOPE OF WORK

The scope of work for the subsurface investigation at the NNG Eunice compressor station is designed to determine (1) if actionable soil and ground-water contamination has originated from potential on- and off-site sources and (2) shallow aquifer characteristics. The investigation will include the following field activities:

- Drill four shallow monitor wells and one soil boring
- Sample seven shallow monitor wells

- Collect soil vapor samples from above the water table
- Conduct aquifer hydraulic tests
- Transport hydrocarbon-contaminated soils stockpiled on-site to an approved disposal facility

All field work will be conducted in accordance with DBS&A standard operating procedures and a site-specific health and safety plan to be developed for the field program. Field activities and report preparation are described in detail in Sections 3.1 and 3.2, respectively.

3.1 Field Activities

Drilling Locations. Four monitor wells and one soil boring will be drilled to establish the distribution of hydrocarbons in ground water, the direction of ground-water flow, and aquifer hydraulic characteristics. Precise drilling locations will be determined in the field based on the location of underground utilities. The proposed drilling locations, along with their rationales, are described below:

- MW-4: Northwest corner of the property to establish background water quality
- MW-5: Southeast corner of the property to verify the elevated TDS concentrations previously measured in monitor well MW-2 and to establish hydrocarbon concentration gradients
- MW-6: Southeast of the compressor building to evaluate hydrocarbon impacts originating from the former gas plant drain pit
- MW-7: Between the compressor building and the current waste oil/water AST to evaluate hydrocarbon concentration gradients between the compressor building and the southern fenceline shared with the gas plant
- SB-1: Southwest corner of the facility to determine the strength of the potential source at the former pipeline liquids AST

Drilling, Soil Sampling, and Monitor Well Construction Methods. Drilling will be accomplished by Eades Drilling Company of Hobbs, New Mexico, using an air-rotary drill rig. Split-spoon and/or core barrel samples will be collected at 5-foot intervals for geologic logging. The soil samples will be tested for the presence of VOCs using an OVM equipped with a photoionization detector (PID). At monitor well locations, the soil sample yielding the highest PID reading and a sample immediately above the water table will be retained for laboratory analysis of total petroleum hydrocarbons (TPH) (EPA method 8015 modified) and BTEX. All soil samples collected from soil boring SB-1 (from approximately 5 feet bgs to the water table [approximately 55 feet]) will be analyzed by the laboratory for the above constituents. Samples will be analyzed by Hall Environmental Analysis Laboratory (HEAL) located in Albuquerque, New Mexico.

All sampling equipment will be decontaminated prior to use by washing with Liquinox® detergent followed by a deionized water rinse. Drilling equipment will be steam cleaned before each boring is drilled.

Monitor wells will be drilled to a depth of 10 feet below the water table, whereupon a 2-inch-diameter monitor well will be constructed in order to evaluate ground-water quality. The monitor wells will consist of 15 feet of 2-inch 0.010-inch machine slotted polyvinyl chloride (PVC) screen, approximately 50 feet of flush-threaded 2-inch PVC blank casing, and 17 feet of 10-20 silica sand filter pack. A bentonite seal will be emplaced on top of the filter pack, followed by a cement-bentonite grout to the ground surface. The surface completion will consist of 12-inch-diameter flush-grade vaults set in a 2-foot by 2-foot by 4-inch-thick concrete pad.

Following monitor well installation, all borings and monitor wells will be surveyed relative to the plant grid system and mean sea level by John W. West Engineering Co. of Hobbs, New Mexico. Additionally, monitor wells installed by previous investigators will be surveyed so that accurate determination of ground-water flow directions can be made.

Well Development. Prior to ground-water sampling, each well will be developed by the surge and bail method until the wells yield relatively sediment-free ground water. Initial development will be conducted by Eades Drilling using a pump pulling rig.

Ground-Water Sampling. Ground-water samples will be collected from all monitor wells by hand-bailing using dedicated, disposable polyethylene bailers. Prior to collecting samples, water levels will be measured and the presence of phase-separated hydrocarbons (PSH) will be determined. Each monitor well will then be bailed until approximately three casing volumes have been purged. During purging, field parameters (pH, temperature, and electrical conductivity) will be measured and recorded every half casing volume. Purged ground water will be contained in 55-gallon drums and appropriately disposed of by TPC personnel, upon receipt of the analytical results.

Ground-water samples will be analyzed by HEAL for BTEX and TPH. Quality assurance/quality control samples, consisting of trip blanks and sample replicates, will comprise approximately 5 to 10 percent of the total number of water and soil samples in order to check intralaboratory precision.

Soil Vapor Sampling. Soil vapor samples will be collected from one to three drilling locations in order to establish vapor phase contaminant concentrations. In order to determine the chemical composition and the potential source(s) of the detected VOCs, the soil vapor sample(s) will be analyzed for BTEX and extended refinery gases from the interval yielding the highest VOC concentrations during drilling.

Soil gas samples will be collected prior to soil boring abandonment and/or monitor well construction. A sampling port constructed of ¼-inch PVC will be set at the desired depth. The annular seal surrounding the sampling port will consist of 10-20 silica sand and a 50/50 (by weight) mixture of dry bentonite powder and 10-20 silica sand to seal the sampled zone. Soil gas samples will be collected in stainless steel canisters and analyzed by Core Laboratories of Houston, Texas. Prior to sample collection, an air pump will be used to purge soil gas from the monitored zone. Following sample collection the ¼-inch PVC will be removed from the borehole to allow monitor well construction or boring abandonment.

Determination of Aquifer Hydraulic Characteristics. Slug withdrawal (rising head) tests will be used to determine the in-situ hydraulic properties of the shallow portion of the aquifer in order to evaluate contaminant transport rates. The main advantage of this method will be the relative

ease of setting up and testing several locations within the shallow aquifer. Slug testing will provide an expedient means of determining the local hydraulic conductivity; however, estimates of specific yield will not be obtained by this method. Specific yield will be estimated based on the observed grain size distributions.

The spatial variability in hydraulic conductivity will be evaluated by conducting approximately four slug tests in site monitor wells. The procedure will consist of submerging a sealed bailer of a known volume below the water table, allowing the water level to equilibrate, and then quickly removing the bailer, thereby creating a slug withdrawal. Recovery of the water level to initial static conditions will be recorded at frequent intervals using pressure transducers and a data logger.

Disposal of Stockpiled Soils. Benge Construction Company of Lovington, New Mexico will provide hauling service for the disposal of the hydrocarbon-contaminated soils stockpiled in the northeast corner of the site. The soils will be hauled to C&C Landfarm, Inc. (C&C) located near Monument, New Mexico. C&C is a commercial surface waste disposal facility permitted by the New Mexico Oil Conservation Commission.

3.2 Investigation Report Preparation

At the conclusion of the field investigation, DBS&A will prepare a report that summarizes the findings of the investigatory activities. The report will include:

- Site history and background, aerial photograph analysis, and regional hydrogeologic framework

- Site characterization, to include soil stratigraphy, hydrogeology, geology, and surface drainage

- Figures, tables, and descriptive text that delineate the areal extent of soil and ground-water impacts based on current and past investigations

- Estimates of potential contaminant volume and mass

- Detailed soil boring logs, well construction diagrams, copies of analytical laboratory reports, chain of custody documentation, and documentation of field activities

The report will be presented to EOC in draft form. Following review and comment by EOC, DBS&A will incorporate EOC's comments and finalize the report.

4. REFERENCES

Brown & Root Environmental. 1993. Final Report: Installation of Monitoring Wells, Eunice Compressor Station. Prepared for Transwestern Pipeline Company, August 1993.

Metric Corporation. 1991. Shallow Subsurface Investigation at the Eunice Compressor Station, Lea County, New Mexico. Prepared for Transwestern Pipeline Company, Roswell, New Mexico, December 1991.

New Mexico Oil Conservation Division (OCD). 1993. Unlined Surface Impoundment Closure Guidelines (February 1993). Tab 7b. *In* Environmental Regulations, State of New Mexico Energy, Minerals, and Natural Resources Department, Oil Conservation Division, Santa Fe, New Mexico.

State of New Mexico
ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT
Santa Fe, New Mexico 87505

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

☐ Telephone ☑ Personal | Time 1300 | Date 5/27/94

Originating Party	Other Parties
Larry Campbell - ENRON	Bill Olson, Roger Anderson, Bobby Myers, Chris Eustice - Envir. Bureau

Subject

Atoka 1 & 2 and Eunice Compressor Station Remediations

Discussion

Discussed status of environmental remediation at the above sites.
OCD awaiting final report on Eunice Station
ENRON wants final closure on Atoka 2 pit closure
OCD ~~Bill~~ believes Atoka 1 needs additional investigation

Conclusions or Agreements

OCD will send ENRON letter on Atoka 1 requesting additional investigation
ENRON will submit letter requesting final closure at Atoka 2 - remediation
ENRON will submit final report on clean up at Eunice Compressor

Distribution
ENRON { Atoka 1 file, Atoka 2 file, Eunice Compressor file

Signed Bill Olson

Phone (505) 623-2761
FAX (505) 625-8060

OIL CONSERVATION DIVISION
RECEIVED
95 MAR 13 AM 8 52

Transwestern Pipeline Company
TECHNICAL OPERATIONS
P. O. Box 1717 • Roswell, New Mexico 88202-1717

April 25, 1994

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

Re: Final Closure Report For Removal of the Contaminated Soils at the Eunice Compressor Station

Dear Mr. Anderson:

Transwestern Pipeline Company (Transwestern), operator of the Northern Natural Gas Company Eunice Compressor Station (GW-123) present the following information addressing soil remediation activities conducted at the facility. This information has been submitted to your agency in fulfillment of requirement No. 4 of Transwestern's April 7, 1993 letter outlining the soil excavation activities of the Oily Wastewater Collection Area underlying the compressor building.

As you may recall, lubrication oils and washdown water generated during operation of the facility engines had accumulated under the eastern extent of the compressor building. The "pooled" liquids were a source of surface and subsurface contamination to the soils overlying the caliche layer at an approximate depth of .three (3) feet.

In August 1993, Transwestern begin remediation of this area by removing the free phase oil and water which had ponded over the soil. EOTT Energy Services conducted the product removal by pumping the liquid to a tanker truck for recycling. The approximate ninety (90) cubic yards of oil contaminated soil were then removed from under the building to the depth of the underlying caliche layer. The agreement to limit the depth of soil removal to the caliche was determined by your agency to be the limit of practical excavation. It was mutally agreed by both parties that the caliche layer, which was determined to vary in thickness from 3 ft. to 15 ft. (METRIC Corporation report, 1991) would act as a barrier to the vertical migration of any oil contaminants and that additional excavation of the caliche underlying the contaminated soil would not be necessary. **Attachment A** presents the total petroleum hydrocarbon (TPH) results for three (3) composite samplings of the soil materials removed from under the building.

Upon removal of all impacted soils, the excavation area was then backfilled with clean soil and compacted. A concrete cap was then constructed over the backfilled material to prohibit reoccurrence of any future soil contamination, and the oil and water waste stream have been directed to a dedicated tank.

The hydrocarbon contaminated soils were then transported the OCD approved C and C Landfarm in Monument, New Mexico. **Attachment B** presents the completed Certificate of Waste Status for Non-Exempt Waste Material required by the OCD prior to movement of the soils to the facility.

Completion of this task fulfills Transwestern's requirements by the OCD to excavate and remediate the contaminated soil area underlying the compressor building. Written confirmation from the OCD is requested by Transwestern for this closure. If you should require any additional information concerning this remediation project, contact our Roswell Technical Operations at (505) 625-8022.

Sincerely,

Larry Campbell

Larry Campbell
Division Environmental Specialist

xc: Greg McIlwain
Bob Bandel
Jim Myers
file

ATTACHMENT A

pace INCORPORATED
THE ASSURANCE OF QUALITY

REPORT OF LABORATORY ANALYSIS

October 05, 1993
Report No.: 00027645

LABORATORY ANALYSIS REPORT

CLIENT NAME: TRANSWESTERN PIPELINE COMPANY
ADDRESS: P.O. BOX 1717
ROSWELL, NM 88202-1717
ATTENTION: LARRY CAMPBELL

LSG CLIENT NO: 0734 0001
PACE PROJECT: H07340001
PACE CLIENT: 620562

SAMPLE ID: NO. 01 - OIL TANK
LSG SAMPLE NO: H0252704
P.O. NO.: VERBAL

EUNICE SOIL CONT.

DATE SAMPLED: UnAvail
DATE RECEIVED: 29-SEP-93
APPROVED BY: L Beyer

LN	TEST CODE	DETERMINATION	RESULT	UNIT
1	I685S	Petroleum Hydrocarbons	240	mg/kg

COMMENTS: Results are reported on an "as received" basis without correction for percent moisture unless previously specified.

900 Gemini Avenue
Houston, TX 77058
TEL: 713-488-1810
FAX: 713-488-4661

REPORT OF LABORATORY ANALYSIS

LABORATORY ANALYSIS REPORT

CLIENT NAME: TRANSWESTERN PIPELINE COMPANY
ADDRESS: P.O. BOX 1717
ROSWELL, NM 88202-1717
ATTENTION: LARRY CAMPBELL

LSG CLIENT NO: 0734 0001
PACE PROJECT: H07340001
PACE CLIENT: 620562

SAMPLE ID: NO. 02 - EAST BUILD.
LSG SAMPLE NO: H0252705
P.O. NO.: VERBAL

DATE SAMPLED: UnAvail
DATE RECEIVED: 29-SEP-93
APPROVED BY: L Beyer

LN	TEST CODE	DETERMINATION	RESULT	UNITS
1	I685S	Petroleum Hydrocarbons	13,000	mg/kg

COMMENTS: Results are reported on an "as received" basis without correction for percent moisture unless previously specified.

900 Gemini Avenue
Houston, TX 77058
TEL: 713-488-1810
FAX: 713-488-4661

LABORATORY ANALYSIS REPORT

CLIENT NAME: TRANSWESTERN PIPELINE COMPANY
ADDRESS: P.O. BOX 1717
ROSWELL, NM 88202-1717
ATTENTION: LARRY CAMPBELL

LSG CLIENT NO: 0734 0001
PACE PROJECT: H07340001
PACE CLIENT: 620562

SAMPLE ID: NO. 03 - SOIL COMPOSITE
LSG SAMPLE NO: H0252706
P.O. NO.: VERBAL

DATE SAMPLED: UnAvail
DATE RECEIVED: 29-SEP-93
APPROVED BY: L Beyer

LN	TEST CODE	DETERMINATION	RESULT	UNITS
1	I685S	Petroleum Hydrocarbons	29,000	mg/kg

COMMENTS: Results are reported on an "as received" basis without correction for percent moisture unless previously specified.

900 Gemini Avenue
Houston, TX 77058
TEL: 713-488-1810
FAX: 713-488-4661

REPORT OF LABORATORY ANALYSIS

QUALITY CONTROL REPORT
SUPPLEMENTAL INFORMATION

			SAMPLE PREPARATION			SAMPLE ANALYSIS				
LN	TEST CODE	BATCH	LR-METHOD	DATE/TIME	ANALYST	LR-METHOD	DATE/TIME	ANALYST	ANLS BATCH	INSTRUMENT
SAMPLE ID: NO. 01 - OIL TANK								LSG SAMPLE NO:	H0252704	
1	I685S	34344	19-3550			02-418.1	30-SEP-93 1300	S S	0	302WAT
SAMPLE ID: NO. 02 - EAST BUILD.								LSG SAMPLE NO:	H0252705	
1	I685S	34344	19-3550			02-418.1	30-SEP-93 1300	S S	0	302WAT
SAMPLE ID: NO. 03 - SOIL COMPOSITE								LSG SAMPLE NO:	H0252706	
1	I685S	34344	19-3550			02-418.1	30-SEP-93 1300	S S	0	302WAT

LR Method Literature Reference
02 EPA-Methods for Chemical Analysis of Water & Wastes, 1984.
19 EPA-Test Methods for Evaluating Solid Waste, 3rd ed, Nov. 1986

900 Gemini Avenue
Houston, TX 77058
TEL: 713-488-1810
FAX: 713-488-4661

REPORT OF LABORATORY ANALYSIS

October 05, 1993
Report No.: 00027645
Section D Page 1

QUALITY CONTROL REPORT
LABORATORY CONTROL SAMPLE RECOVERY

TEST CODE	DETERMINATION	PERCENT RECOVERY	ACCEPTANCE LIMITS
BATCH: 34344	SAMPLE ID: Lab Control Sample		LSG SAMPLE NO: H0253745
I685S	Petroleum Hydrocarbons	92.0	-

900 Gemini Avenue
Houston, TX 77058
TEL: 713-488-1810
FAX: 713-488-4661

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THE ASSURANCE OF QUALITY

REPORT OF LABORATORY ANALYSIS

October 05, 1993
Report No.: 00027645

QUALITY CONTROL REPORT
METHOD BLANK DATA

TEST CODE	Determination	RESULT	UNITS
BATCH: 34344	SAMPLE ID: Method Blank	LSG SAMPLE NO: H0253746	
I685S	Petroleum Hydrocarbons	< 20	mg/kg

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Houston, TX 77058
TEL: 713-488-1810
FAX: 713-488-4661

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REPORT OF LABORATORY ANALYSIS

October 05, 1993
Report No.: 00027645
Section F Page 1

QUALITY CONTROL REPORT
DUPLICATE AND MATRIX SPIKE DATA

PREP BATCH: 34344 LSG SAMPLE NO: H0252421

TEST	DETERMINATION	ORIGINAL RESULT	DUPLICATE RESULT	UNITS	RANGE / RPD	UNITS	MS RESULT	MS % RCVRY
I685S	Petroleum Hydrocarbons	1,800	1,800	mg/kg	0.0	mg/kg	2,800	*

* The concentration of the analyte prevented accurate determination of the

900 Gemini Avenue
Houston, TX 77058
TEL: 713-488-1810
FAX: 713-488-4661

TRANSWESTERN PIPELINE COMPANY

CHAIN OF CUSTODY

District: ROSWELL TECH Date: 9-28-93

Sample Location Valve or Receiver No.	Vol. Collect. During Flush	Sampler
EUNICE PLANT		EARL CHANLEY

SAMPLE ID NUMBER	SOLVENT USED	SAMPLE ICED	ANALYSES REQUESTED
No. 01 - OIL TANK	"		TPH
No. 02 - EAST BUILD.	"		TPH
No. 03 - SOIL COMPOST	"		TPH

Relinquished By EARL CHANLEY Date 9-28-93
Relinquished To FED-X Date 9-28-93

Relinquished By FED-X Date
Relinquished To PACE LAB Date

Relinquished By Date
Relinquished To Date

Relinquished By Date
Relinquished By Date

Laboratory:
Received: Jennifer Adams PACE Date 9-29-93
1230

H252704-706

ATTACHMENT B

CERTIFICATE OF WASTE STATUS

NON-EXEMPT WASTE MATERIAL

Originating Location: Northern Natural Gas Co - Eunice Compressor Station

Source: Oil Contaminated Soil

Disposal Location: C & C Landfarm, Monument New Mexico

"As a condition of acceptance for disposal, I hereby certify that this waste is a non-exempt waste as defined by the Environmental Protection Agency's (EPA) July 1988 Regulatory Determination. To my knowledge, this waste will be analyzed pursuant to the provisions of 40 CFR Part 261 to verify the nature as non-hazardous. I further certify that to my knowledge no "hazardous or listed waste" pursuant to the provisions of 40 CFR, Part 261, Subparts C and D, has been added or mixed with the waste so as to make the resultant mixture a "hazardous waste" pursuant to the provisions of 40 CFR, section 261.3(b)."

I, the undersigned as the agent for Transwestern Pipeline Company concur with the status of the waste from the subject site.

Name Larry Campbell

Title/Agency Division Env. Specialist

Address 6381 North Main St.

Roswell, New Mexico

Signature Larry Campbell

Date 9/28/94

State of New Mexico
ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT
Santa Fe, New Mexico 87505

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

MEMORANDUM OF MEETING OR CONVERSATION

☒ Telephone ☐ Personal	Time 1115	Date 9/23/93

Originating Party	Other Parties
Larry Campbell - ENRON	Bill Olson - Envir. Bureau

Subject

ENRON Eunice Remediation

Discussion

Reports submitted are interim reports of on going remediation

ENRON will be submitting final reports on completion of excavations. Will propose additional monitor wells for plume definition at ground water at that time

Conclusions or Agreements

Reports will be submitted and ENRON will meet with OCD to discuss in approx. 90 days

Distribution

Signed Bill Olson

Phone (505) 623-2761
FAX (505) 625-8060

Transwestern Pipeline Company
TECHNICAL OPERATIONS
P. O. Box 1717 • Roswell, New Mexico 88202-1717

September 17, 1993

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

Dear Mr. Anderson:

As per Transwestern Pipeline Company's letter correspondence of April 7, 1993, addressing environmental concerns at the Northern Natural Gas Eunice Plant, enclosed find a copy of an internal report addressing item nos. 2) Sump Removal and 4) Oily Wastewater Collection Area.

Additonally, enclosed find documentation describing the removal of the below grade tanks at this facility.

Approximately four to six weeks of remediation remain in the completion of the above described tasks. All excavation has been removed to the caliche bedrock.

Should you require any additional information, contact our Roswell Technical Operations at 625-8022.

Sincerely,

Larry Campbell
Division Environmental Specialist

xc: Greg McIlwain
Ronnie Robbins
Jim Meyers
file

Phone (505) 623-2761
FAX (505) 625-8060

Transwestern Pipeline Company
TECHNICAL OPERATIONS
P. O. Box 1717 • Roswell, New Mexico 88202-1717

Roswell, New Mexico
September 16, 1993

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

Re: Eunice Remediation

The remediation of Transwestern/Northern Natural Gas Company's Eunice compressor station is in progress. Removal of hydrocarbon contaminated soil has begun along with the removal of buried process vessels.

Attached are pictures of the work that has been done to date and a plot plan of the Eunice site. The plot plan indicates where the vessels have been removed and areas of soil remediation to date along with the picture numbers corresponding to the area of work.

The vessels that have been removed are as follows;

1) Compressor cooling water drain tank:
   Picture #01
   Size: 6' depth x 10' dia.
   Material: Steel
   Condition: Good

2) Sump - Overfill for jacket water:
   Picture #02
   Size: 60" x 60"
   Material: Fiberglass
   Condition: Good

3) Oil drain tanks (2) unit No. 7
   Picture #03
   Size: 72" deep x 48" dia.
   Material: Fiberglass
   Condition: Good
   These tanks were indentifed in our correspondence of April, 1993, as to be removed.

4) Oil drain tank unit No. 7
Picture #03

Size: 3′ dia. x 5′
Material: Steel
Condition: Good

5) Glycol drain tank unit 1 -4
Picture #04

Size: 60" od x 10′
Material: Steel
Condition: Good

6) Oil drain tank unit 1 - 4
Picture #05

Size: 36′ od x 9′
Material: Steel
Condition: Good

7) Sump - overflow
Picture #06

Size: 6′ x 6′ x 6′ deep
Material: Concrete
Condition: Good

Excavated sites in the plant yard with their corresponding picture numbers as follows;

Picture # 07-08:

Removed the steel drain tank in picture #03. The area excavated was 12′ x 6′ x 7′ deep for the tank and another 15′ x 8′ x 3′ deep for related piping. In removing the tank, the excavation was in bed rock and cliche and was clean. This tank and coating was in good condition and there were not any indications of leaks.

Picture # 09-10-11:

Remove the fiberglass tanks (2) in picture # 03. The area excavated was 9′ x 15′ x 6.5′ deep for the tanks and 66′ x 25′ x 2′ to 3′ deep for the surrounding area. Tanks were in good condition and there was not any indication of past leakage. In removing these tanks, the excavation was down to bed rock and cliche and was clean.

Picture # 12-13:

The pipeline liquids tank had previously been relocated into the south containment area. These pictures are of the clean up in progress and more soil is to be remove at this site to the underlying layer of caliche as stated in the April, 1993, letter to O.C.D..

Picture # 14-15:

The lube oil tank had previously been relocated to the north containment area. The area excavated was 20′ x 12′ x 4′ deep and was clean.

Picture # 16-17:

Excavation of the compressor cooling system drain tank. The area excavated was 15′ x 15′ x 6′ deep. the tank was in good condition and there was not any indication of leakage and this site was clean.

Picture # 18-19:

Excavation of the buried tanks located behind the compressor building. The tank excavation was 15′ x 15′ x 9′ deep and was down to bed rock and cliche. Another 30′ x 25′ x 4′ deep area of soil was removed around the excavation of the tanks down to the cliche. More soil is to be removed behind the engine room, along the south side and the piping header area, as the work progresses.

Picture # 21-22-23:

Excavation of the east end of the compressor building. The area excavated is 15′ x 50′ x 3′ deep and is down to the layer of cliche.

Picture # 24:

Excavation of the southeast corner of the compressor building. Remediation of this area is still in progress. The underlying layer of caliche was reached at the 3′ level in this area.

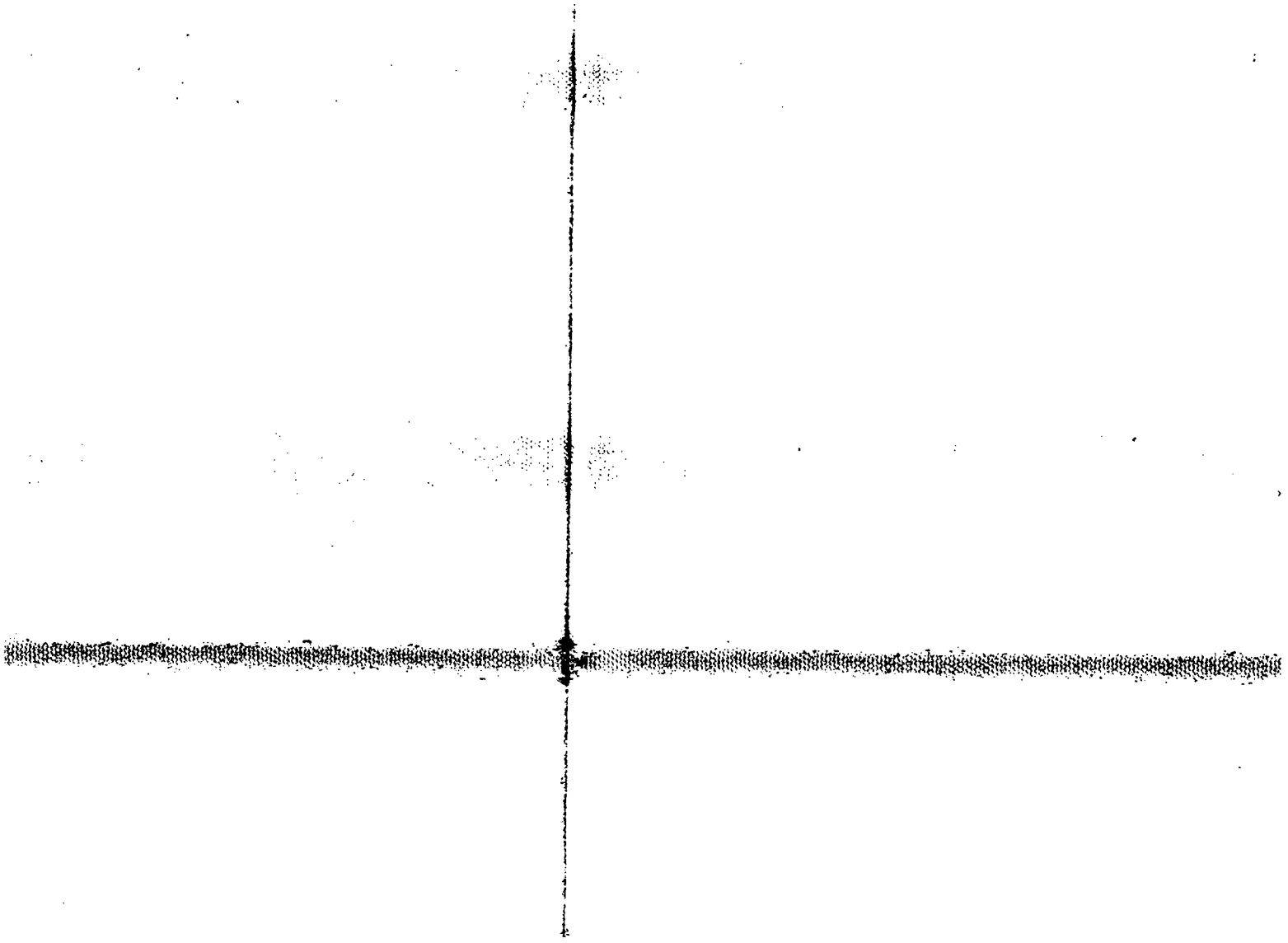
This area is located on the North side of the backfilled drain pit. Further excavation will be done in this area to determine the presence and level of the underlying layer of caliche as stated in the correspondence of April, 1993.

Picture # 25-26-27-28:

Excavation of the soil under the east end of the compressor building. This area is 20' x 40' x 3' deep and is down to the cliche and bedrock. This area is being cleaned very thoroughly, backfilled to within 6" of present basement floor and a concrete floor will be poured so all the basement floor of the compressor building will be concrete. The oil/water phase that had collected at this site was pumped to a holding tank and will be tested as the work progresses.

Picture # 29:

Estimated 450 cubic yards of soil removed to date. More soil is to be removed as work progress.



#11-17
#01
COMPRESSOR COOLING DRAIN TANK
COMPRESSOR COOLING
COOLING TOWER
COOLING TOWER
WATER SURGE TANK
PUMPS
STATION DISCHARGE
4" BLOWDOWN
NORTH CONTAINMENT 44'x26'x2
#27
WAREHOUSE
OFFICE BLDG.
WAREHOUSE
ROADWAY
TANK RELOCATED TO NORTH CONT.
#14-15
LARGE OIL TANKS
OIL DRAIN #7
#03
09-10-11
STORAGE AREA
ENGINE NO. 4
ENGINE NO. 3
ENGINE NO. 2
ENGINE NO. 1
#02
#04-05
25-26-27-28
J.W. DRAIN
L.O. DRAIN
SUMP
21-22-23-24
24" SUCTION
10" DISCHARGE
OIL DRAIN #7
#03
#07-08
#16-19
#06
SUMP
GAS COOLING TOWER
LEECH FIELD
FENCE
TEXACO LINE
METER BLDG.
JACKET WATER COOLING TOWERS
SOUTH CONTAINMENT 36'x60'x2
DOCK AREA
#12-13
2-12" METER RUNS
CONTAMINATED DIRT REMOVED
TANK RELOCATED TO SOUTH CONTAINMENT
INLET SCRUBBER
TANKS REMOVED
#01
PICTURE NO.
FROM TEXACO PLANT

WORK IN PROGRESS

P.L. or Sta. Account No. EUNICE STATION			W.O. R43523			1993 Construction				
Micrfilm File No.	Mflm. By	Date	Dr. By EC		Date 9-93	Scale				
Revision – Description	By	App.	Dwg. Stat.	Ckd. By	Date	App. By	Date	App. By	Date	
			Prel'y.							
			Bid							
			Const.							

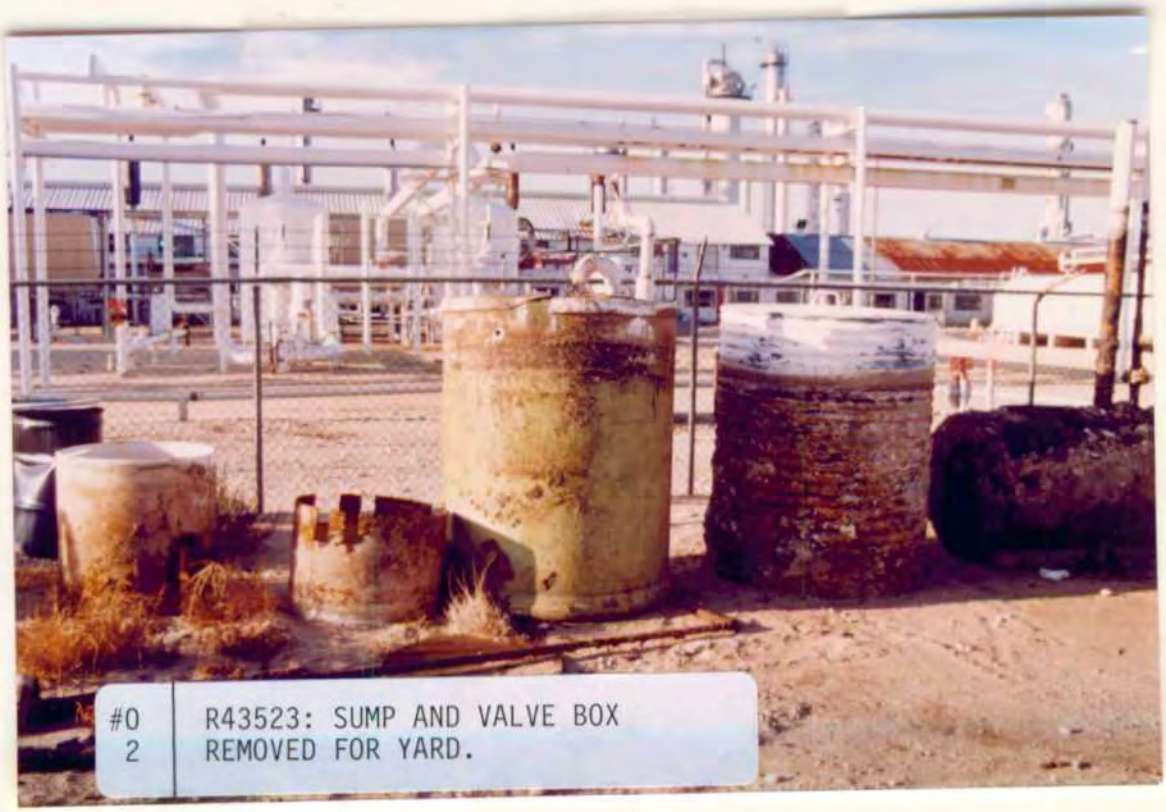
ENRON
Gas Pipeline Operating Company
Houston, Texas

NEW MEXICO
EUNICE COMPRESSOR STA.
PLOT PLAN
LEA COUNTY
NW 1/4 SEC 29 T22S R37E

ENRON GAS PIPELINE GROUP

CHF. ENG.	
VICE PRES.	
OPER. CO.	
DWG. NO.	

#0 1	R43523: COMPRESSOR COOLING SYSTEM DRAIN TANK - REMOVED



#0 2	R43523: SUMP AND VALVE BOX REMOVED FOR YARD.

03 R43523: (3) OIL DRAIN TANKS REMOVED, #7 DRAINS

04 R43523: GLYCOL FLOW-THRU TANK, UNIT 1 - 4, REMOVED

05 R43523: OIL DRAIN TANK FOR UNITS 1 - 4, REMOVED

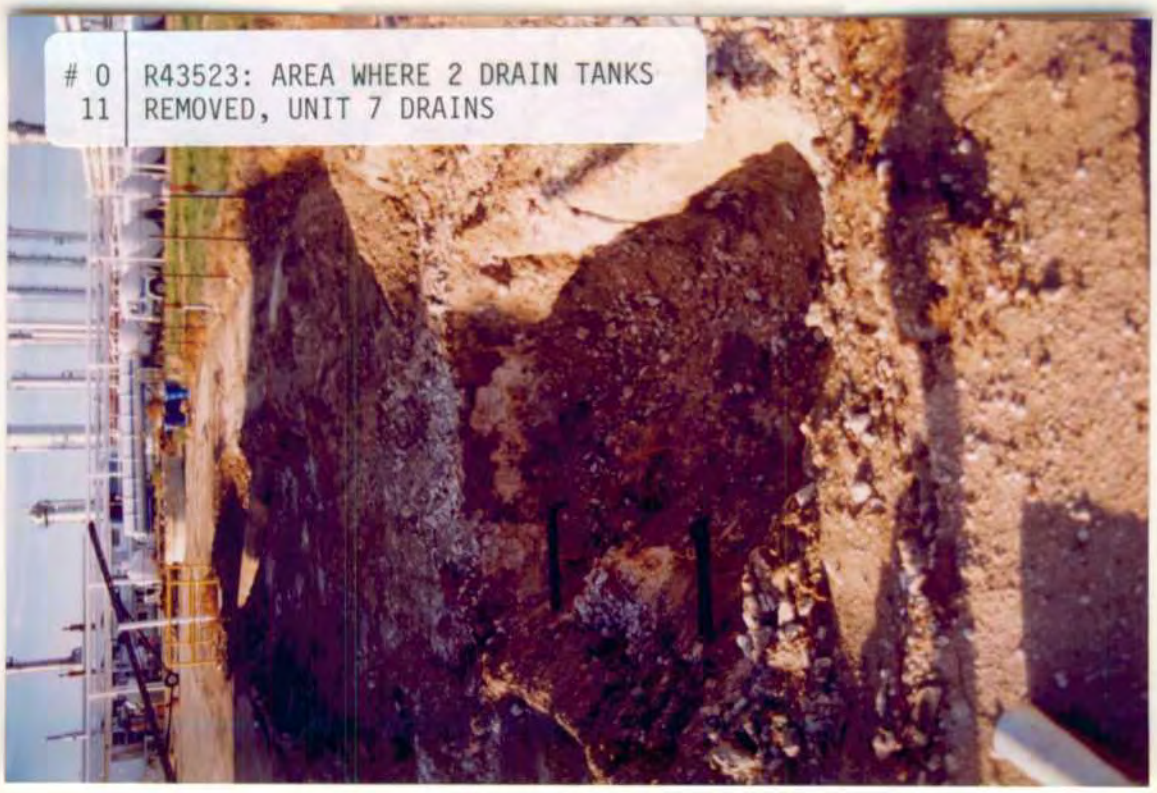
06 R43523: SUMP IN PLANT YARD BEING REMOVED

# 07	R43523: UNIT 7 OIL DRAIN TANK REMOVED

# 08	R43523: UNIT 7 OIL DRAIN TANK REMOVED.

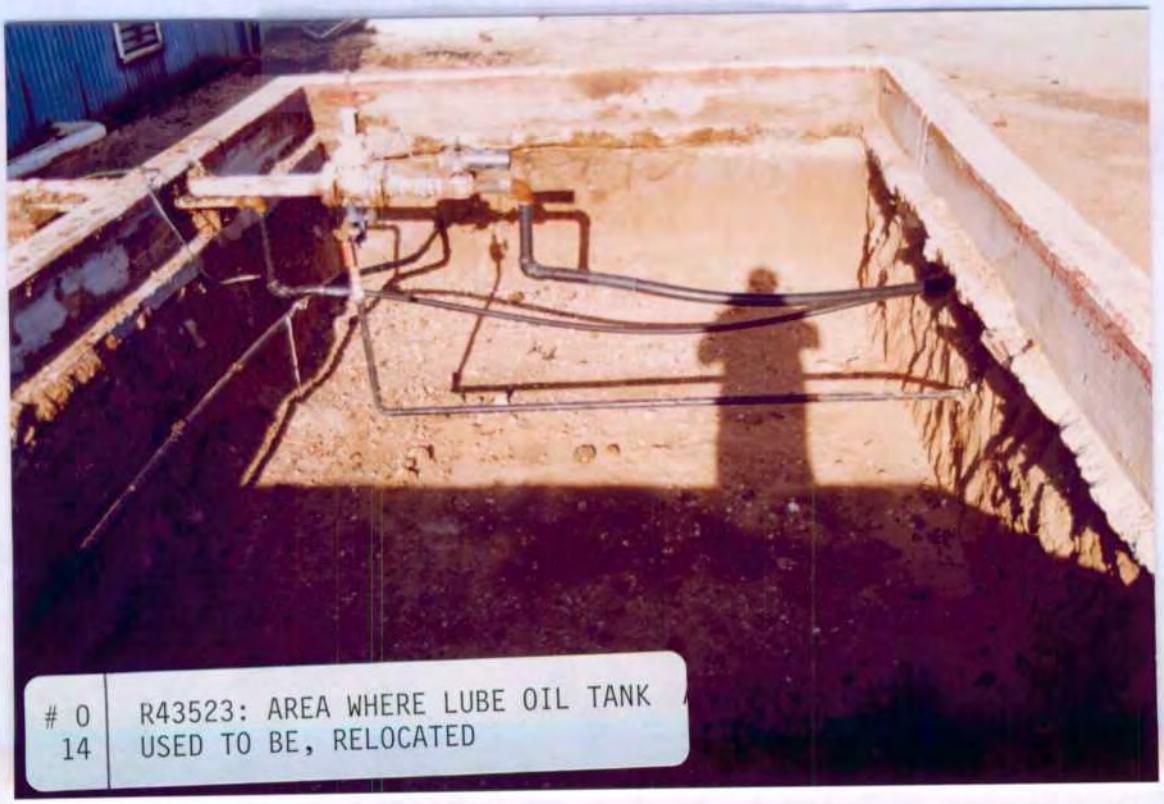
09 R43523: AREA WHERE 2 DRAIN TANKS REMOVED, UNIT 7 DRAINS


0
10
R43523: AREA WHERE 2 DRAIN TANKS
REMOVED, UNIT 7 DRAINS


0
11
R43523: AREA WHERE 2 DRAIN TANKS
REMOVED, UNIT 7 DRAINS


0
12
R43523: REMOVING DIRT WHERE
PIPELINE LIQUIDS TANK WAS


0
13
R43523: REMOVING DIRT WHERE
PIPELINE LIQUIDS TANK WAS



0 14 R43523: AREA WHERE LUBE OIL TANK USED TO BE, RELOCATED

#0 15 R43523: AREA HERE LUBE OIL TANK WAS, RELOCATED

0 16 R43523: AREA WHERE COMPRESSOR COOLING DRAIN TANK WAS, RELOCATED

0 17 R43523: AREA WHERE COMPRESSOR DRAIN TANK WAS, RELOCATED

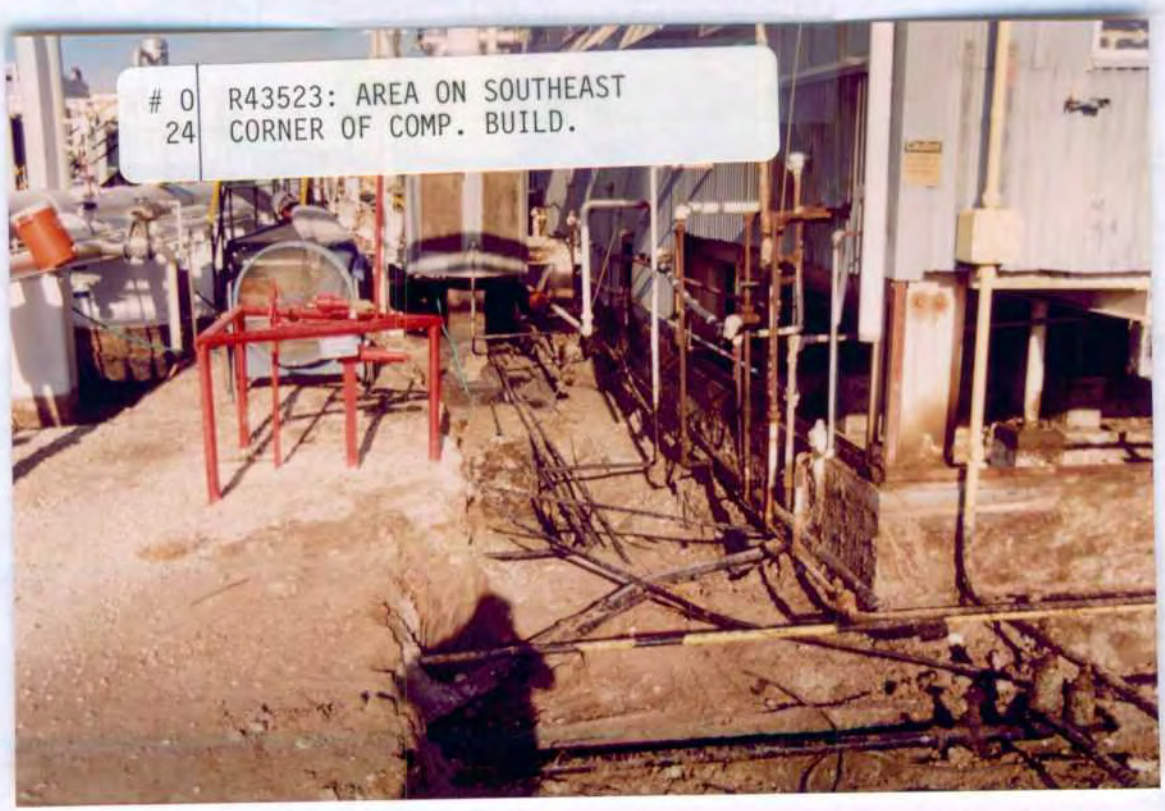

0 18
R43523: AREA WHERE DRAIN TANKS
FOR UNITS 1 - 4 WHERE


0 19
R43523: AREA WHERE DRAIN TANKS
UNITS 1 - 4 WAS


0
21
AREA EAST OF COMPRESSOR BUILD.


0
22
AREA ON EAST END OF COMPRESSOR
BUILD.

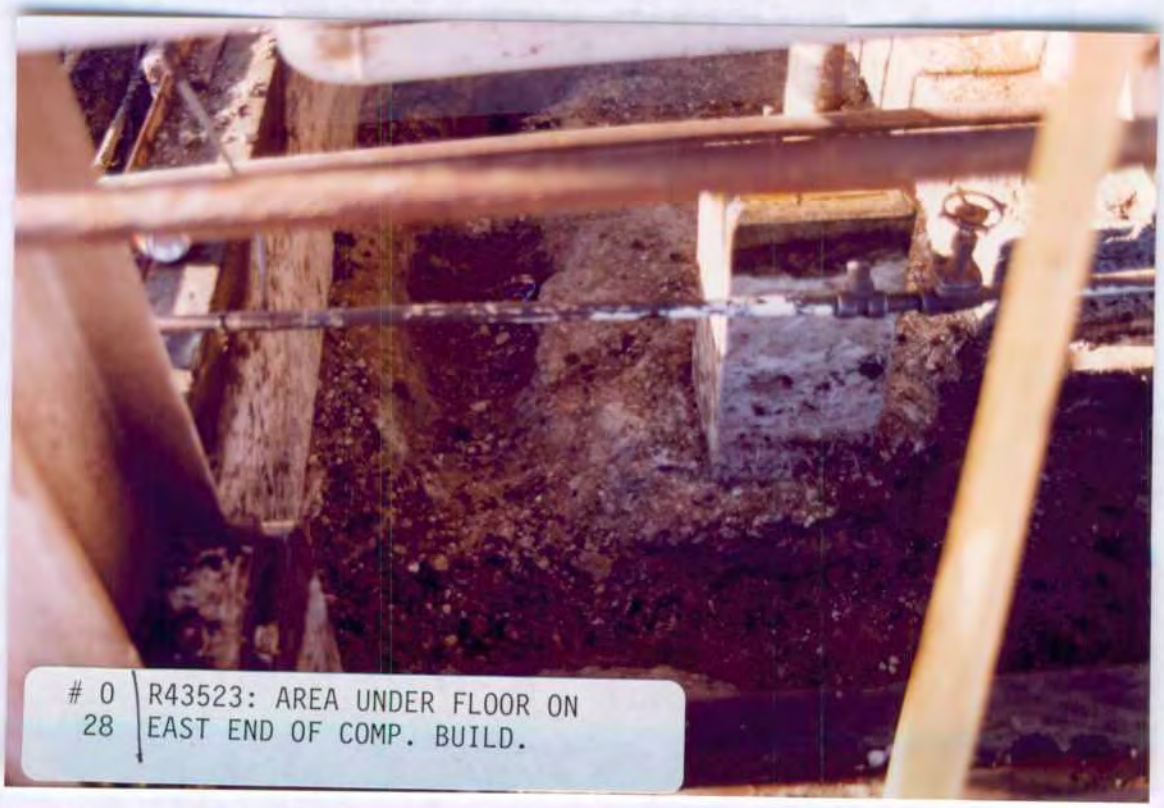

0 23
R43523: AREA ON EAST END OF COMPRESSOR BUILD.


0 24
R43523: AREA ON SOUTHEAST CORNER OF COMP. BUILD.


0
25
R43523: UNDER THE COMPRESSOR BUILD.
EAST END


0
26
R42523: EAST END OF COMPRESSOR
BUILD. UNDER FLOOR

0 27 R43523: AREA UNDER FLOOR AT EAST END OF BUILDING.



0 28 R43523: AREA UNDER FLOOR ON EAST END OF COMP. BUILD.


0
29
R43523: DIRT REMOVE IN 12 DAYS
OF REMOVAL, APX. 450 C.Y.

Phone (505) 623-2761
FAX (505) 625-8060

Transwestern Pipeline Company
TECHNICAL OPERATIONS
P. O. Box 1717 • Roswell, New Mexico 88202-1717

September 9, 1993

RECEIVED
SEP 13 1993
OIL CONSERVATION DIV.
SANTA FE

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

Dear Mr. Anderson:

As per Transwestern Pipeline company's letter correspondence of April 7, 1993, addressing environmental concerns at the Northern Natural Gas Eunice Plant, enclosed find a copy of a report entitled," Installation of Monitoring Wells Eunice Compressor Station." This report has been submitted in partial fulfillment of addressing concern no. 3 of that letter.

I will be contacting you shortly to discuss the findings and results of this study, and future activities Transwestern will implement in the remediation of the contaminated groundwater that is present.

Should you require any additional information prior to the future meeting, contact our Roswell Technical Operations at 625-8022.

Sincerely,

Larry Campbell

Larry Campbell
Division Environmental Specialist

xc: Berkeley Beard
Jim Meyers
Greg McIlwain
file

Phone (505) 623-2761
FAX (505) 625-8060

OIL CONSERVATION DIVISION
RECEIVED
'93 APR 12 AM 8 44

Transwestern Pipeline Company
TECHNICAL OPERATIONS
P. O. Box 1717 • Roswell, New Mexico 88202-1717

April 7, 1993

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

Dear Mr. Anderson:

As a result of the April 1, 1993 meeting between Transwestern Pipeline Company (TPC) and the Oil Conservation Division (OCD), presented herein is a remediation plan for correcting identified environmental concerns at the Eunice Compressor Station. This plan has been submitted to your agency as per your request, and addresses those environmental deficiencies identified during that meeting and in a report by METRIC Corporation entitled, "Shallow Subsurface Investigation at the Eunice Compressor Station Lea County, New Mexico".

In this meeting, four areas of environmental concern were targeted for further investigation and/or remediation. Each of the items discussed and the proposed action to address each concern are presented below:

1. Hydrocarbon Contaminated Soils

Areas were identified as having contamination of total petroleum hydrocarbons (TPH). As this contiguous area comprises acres, and is underlain by an indurated caliche layer at approximately 3 feet, it was agreed to by TPC and the OCD that the most appropriate remediation to reduce the TPH contamination is to scarify or "lightly" disk the contaminated surface soils and apply an inorganic nitrogen, phosphorus, and potassium fertilizer. This insitu bioremediation will be monitored by soil sampling to determine the reduction of TPH in the soils.

2. Sump Removal

Two fiberglass below grade sumps which are employed to collect used lubrication oil from filters will be removed. In the event a leak or release from the fiberglass sumps has occurred, soil cleanup levels will follow those target values as identified in the OCD "Unlined Surface Impoundment Closure Guidelines".

3. Groundwater Investigation

As a result of the contaminated groundwater which was identified from the sampling of the two monitor wells onsite, an additional well is to be constructed in the southwest corner of the facility property. The purpose of this monitor well is to determine water table gradients, and the potential offsite source of contamination.

To further understand and determine potential sources of the contaminated groundwater conditions, the integrity of the caliche underlying the backfilled drain pit and the pipeline liquids tank will be evaluated. Four locations in the pit bottom and four locations in the immediate area of the tank will be hand augured to determine the presence or absence of the underlying caliche.

4. Oily Wastewater collection Area

In an approximate 20'x 40'area underlying the eastern extent of the compressor building, lubrication oil and water has collected. Testing of the liquids and subsoils has confirmed the non hazardous hydrocarbon contamination status. To complete cleanup and closure of this area, TPC agrees to the following remediation activity: The source of the hydrocarbon release to this area will be eliminated. The oil/water phase which is "pooled" under the building will be removed by pumping or by vacuum. The sides of the compressor building encompassing the collection area will be partially removed to allow access to the hydrocarbon contaminated soils. Excavation and removal of the contaminated soils will be performed to the depth of the underlying caliche layer. The area will be backfilled with clean soil, pending sampling and submittal to the OCD of the surface caliche TPH concentrations.

As a compliance notification, TPC will submit sampling results and completion reports for each of the above environmental concerns as they are addressed.

Should you require additional information concerning the proposed actions, contact our Roswell Technical Operations at 625-8022.

Sincerely,

Larry Campbell

Larry Campbell
Division Environmental Specialist

xc: Greg McIlwain
Ronnie Robbins
Jim Meyers
Lou Soldano Enron Legal
file

Phone (505) 623-2761
FAX (505) 625-8060

Transwestern Pipeline Company
TECHNICAL OPERATIONS
P. O. Box 1717 • Roswell, New Mexico 88202-1717

March 19, 1993

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

Dear Mr. Anderson:

Enclosed find one (1) copy each of the following reports describing surface impoundment studies which were conducted for the following Transwestern Pipeline Company facilities:

"Shallow Subsurface Investigation at the Eunice Compressor Station Lea County, New Mexico" METRIC Corporation

"Site Investigation Transwestern Pipeline Company Compressor Station Wt-1 Carlsbad, New Mexico" Brown & Root Environ.

This information has been submitted to your agency in preparation of the agreed upon meeting with Transwestern on April 1, 1993 in Santa Fe. At your convenience, review each document prior to this meeting.

Sincerely,

Larry Campbell

Larry Campbell
Division Environmental Specialist

xc: Greg McIlwain w\o attachments
Rich Jolly " "
Lou Soldano " "
Jim Meyers " "
file

OCD/ENRON 4/1/93 Meeting 1:00 pm

Bill Olson - OCD
Roger Anderson - OCD
Larry Campbell - ENRON

Eunice Station

discuss Dec. 1991 Invest. report

Want to consider insitu bioremediation for shallow cont. except for Bit-14 area
Will put MW in Bit-14 for determining gradient (hydraulic)
Will put in boring in old drain pit to the caliche to look at source potential
will give three phase work plan on this

Carlsbad WT-1

O-3, MW-2 have floating product

Will submit workplan on additional G.W. monitoring, product removal and risk approach for soil contaminants

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

June 21, 1993

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

CERTIFIED MAIL
RETURN RECEIPT NO.P-111-334-215

Mr. Larry Campbell
Transwestern Pipeline Company
P.O. Box 1717
Roswell, New Mexico 88202-1717

RE: Discharge Plan GW-113 Modifications
Eunice Compressor Station
Lea County, New Mexico

Dear Mr. Campbell:

The groundwater discharge plan modification for the Transwestern Pipeline Company Eunice Compressor Station located in the NW/4 of Section 27, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico **is hereby approved** under the conditions contained in the enclosed attachment. The modification consists of the discharge plan as approved June 19, 1992 and the modification application dated May 7, 1993.

The modification application was submitted pursuant to Section 3-109.F of the Water Quality Control Commission Regulations. It is approved pursuant to Section 3-109.A. 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 tanks (tanks exceeding 16 feet in diameter) shall be screened, netted or otherwise rendered nonhazardous to wildlife including migratory birds.

Your proposed modifications are to construct a centralized landfarm facility at the specified location.

Please note that Section 3-104 of the regulations requires that "When a plan has been approved, discharges must be consistent with the 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.

The discharge plan modification application for the Transwestern Pipeline Company Eunice Compressor Station is subject to the WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan modification will be assessed a fee equal to the filing fee of fifty (50) dollars plus the flat rate fee of six-hundred ninety (690) dollars for compressor stations in excess of 3000 horsepower.

The OCD has **not** received your $50 filing fee and is due upon receipt of this letter. The flat rate fee may be paid in a single payment due at the time of approval, or in equal installments over the duration of the plan, with the first payment due upon receipt of this letter.

Please make all checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office.

On behalf of the staff of the Oil Conservation Division, I wish to thank you and your staff for your cooperation.

Sincerely,

William J. LeMay
Director

WJL/cee

xc: OCD Aztec Office

TRANSWESTERN PIPELINE EUNICE COMPRESSOR STATION
DISCHARGE PLAN REQUIREMENTS
CENTRALIZED LANDFARM
(May 14, 1993)

1. The six-hundred ninety ($690) dollar flat fee (either total payment or first installment) will be paid upon receipt of this letter along with the fifty ($50) dollar application fee.

2. One (1) background soil sample will be taken from the center portion of the landfarm two (2) feet below the native ground surface prior to operation. The sample will be analyzed for total petroleum hydrocarbons (TPH), general chemistry, volatile aromatic organics (BTEX), and heavy metals using approved EPA methods.

3. The landfarm will be underlain by 2 separate layers of 6 ml visqueen liners to provide deterrent to vertical migration.

4. A treatment zone not to exceed three (3) feet beneath the landfarm will be monitored. Monitoring will consist of a minimum of one random soil sample taken every six (6) months to be analyzed, using EPA Methods, for TPH and BTEX to ensure containment of the contaminants. The sample will be taken two to three feet below the landfarm surface.

5. An adequate berm will be constructed and maintained to prevent runoff and runon for that portion of the facility containing contaminated soils.

6. Only contaminated solids which are non-hazardous by RCRA Subtitle C exemption or by characteristic testing will be accepted at the facility. Solids from operations not currently exempt under RCRA Subtitle C or mixed exempt/non-exempt will be tested for appropriate hazardous constituents. Test results must be submitted to the OCD along with a request to receive the non-exempt solids, and a written OCD approval (case specific) must be obtained prior to disposal.

7. Only contaminated soils from Transwestern Pipeline operations will be accepted at the landfarm.

8. No free liquids or soils with free liquids will be accepted at the landfarm.

9. Soils will be spread on the surface in six (6) inch lifts or less.

10. Soils will be disked a minimum of one time every two weeks (minimum) to enhance the biodegradation of the contaminants.

11. Successive lifts of contaminated soils will not be spread until a laboratory measurement of TPH in the previous lift is less than 100 parts per million (ppm), the sum of all BTEX is less than 50 ppm, and the benzine is less than 10 ppm. Comprehensive records of the laboratory analysis will be maintained at the facility. Authorization from the OCD will be obtained prior to the application of successive lifts.

12. Any pooling of liquids that occur as a result of precipitation will be removed within seventy-two (72) hours.

13. Enhanced bio-remediation through the application of water, microbes, and/or fertilizers will be permitted only after prior approval from the OCD.

14. The OCD will be notified in accordance with Rule 116 of any break, spill, blow out, or fire or any other circumstance that could constitute a hazard or contamination.

15. Removal of remediated soils from the landfarm will be on a case by case approval basis.

16. Analytical results from the treatment zone monitoring w . be submitted to the OCD Santa Fe Office within thirty (30) days of receipt from the analytical lab.

17. After obtaining the bi-annual sample from the treatment zone the liners (2) will be repaired to maintain the integrity of the liners.

18. Comprehensive records of all material disposed of at the facility will be maintained at the facility.

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

June 16, 1993

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 notice of publication received by the U.S. Fish and Wildlife Service (Service) on May 17, 1993, regarding effects of Oil Conservation Division discharge permit No. 1552 on fish, shellfish, and wildlife resources in New Mexico.

The Sunterra Gas Processing Company has submitted a discharge plan renewal application for the Kutz Canyon Gas Plant located in SW/4 Section 12, NE/4 Section 13, SE/4 Section 14, T28N, R11W, NMPM, San Juan County, New Mexico. The renewal application requests that 4,200 gallons of process waste water be permitted for disposal in a double lined evaporation pond equipped for leak detection. The Service is concerned that open ponds could prove an attractive nuisance to migratory birds. The Service recommends that Sunterra Company take the necessary steps to ensure that migratory birds can not gain access to process waste water in the evaporation pond. Such steps could include screening or netting the pond to physically exclude migratory birds from the pond.

The Sunterra Company should also be advised that if toxic substances in their process waste water evaporation pond adversely affect migratory birds, they may be held liable under the enforcement provisions of the Migratory Bird Treaty Act (MBTA). The MBTA makes it unlawful for anyone at anytime or in any manner to pursue, hunt, take, capture, kill, transport or possess any migratory birds unless authorized by a permit issued by the Department of the Interior. Illegal take has been interpreted by the courts to include, among other things, accidental poisoning or accumulation of harmful levels of contaminants by migratory birds, even if the contamination event was accidental or the perpetrator was unaware of the fact that his/her actions (or failure to take action) could ultimately prove harmful to migratory birds. The strict liability enforcement provisions of the MBTA precludes the necessity of proving intent and permits criminal prosecution of persons, associations, partnerships, or corporations which inadvertently or intentionally "kill or illegally take" one or more migratory birds.

In regards to the Transwestern Pipeline Company modification of a previously approved discharge plan for its Eunice Compressor Station in Lea County, New Mexico, the Service has determined there are no wetlands or other environmentally sensitive habitats, plants, or animals that will be adversely affected by the proposed permit modification. The modification consists of the addition of a soils landfarm for remediation of "non-hazardous oil contaminated soils." The Service advises that management practices be implemented on the soils landfarm that will avoid spills, leaks and other accidental discharges to the surface. The Service further recommends that the landfarm be managed to discourage plant growth that may prove an attractive nuisance to migratory birds and/or other wildlife.

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

Sincerely,

Jennifer Fowler-Propst
Field Supervisor

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

AFFIDAVIT OF PUBLICATION

No. 31739

STATE OF NEW MEXICO,
County of San Juan:

KIT OWENS being duly sworn, says: "That he is the ADVERTISING DIRECTOR 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 FRIDAY, MAY 21, 1993

Second Publication

Third Publication

Fourth Publication

and the cost of publication was $ 49.65

On May 25, 1993 Kit Owens personally appeared before me, whom I know personally to be the person who signed the above document.

Notary Public, San Juan County, New Mexico

My Comm expires: April 2, 1996

COPY OF PUBLICATI

NOTICE OF PUBLICATION
STATE OF NEW MEXICO
ENERGY, MINERALS AND NATURAL RESOURC
OIL CONSERVATION DIVISIOI

Notice is hereby given that pursuant to the New Me Commission Regulations, the following discharge pla submitted to the Director of the Oil Conservation Division, P.O. Box 2088, Santa Fe, New Mexico 87504-2088, Telep

(GW-4S) - Sunterra Gas Processing Compan Environmental Engineer, P.O. Box 26400, Alb 87125, has submitted a discharge plan renew Kutz Canyon Gas Plant located in SW/4 Secti SE/4 Section 14, Township 28 North, Range County, New Mexico. Approximately 4,200 ga waste water will be disposed of in an OCD ap evaporation pond with leak detection. The to concentrations of the waste water is approxi per liter (mg/l). Groundwater most likely to b discharge at the surface is shallow perched concentrations 8,000 to 18,000 mg/l. Deeper depth of about 200 feet with estimated TDS c 2,000 and 4,000 mg/l.

(GW-113) - Transwestern Pipeline Co., Larry Environmentalist, P.O. Box 1717, Roswell, N has submitted an application for modificatio approved discharge plan for its Eunice Com NW/4 Section 27, Township 22 South, Range County, New Mexico. The modification cons soils landfarm for remediation of non-hazarc soils. The landfarm will be underlain by imp bermed to prevent runoff of contaminants. (be affected by any accidental spill is at a de feet with a total dissolved solids concentrat The modification addresses how spills, leak discharges to the surface will be managed.

Any interested person may obtain further informatic Division and may submit written comments to the Dire Division at the address given above. The discharge plan a the above address between 8:00 a.m. and 5:00 p.m., M ruling on any proposed discharge plan or its modificat Conservation Division shall allow at *least thirty* (30) days of this notice during which comments may be submitted may be requested by any interested person. Request for the reasons why a hearing shall be held. A hearing determines that there is significant public interest.

If no hearing is held, the Director will approve or disa information available. If a public hearing is held, the D based on the information in the plan and information pre

GIVEN under the Seal of New Mexico Oil Conservat New Mexico, on this 10th day of May, 1993.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
WILLIAM J. LEMAY, Director

Legal No. 31739 published in the Farmington D Mexico on Friday, May 21, 1993.

STATE OF NEW MEXICO
County of Bernalillo ss

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

for 1 times, the first publication being on the 22 day of May, 1993, and the subsequent consecutive publications on _____, 1993

Dianne Berglund

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

PRICE $30.57

Statement to come at end of month.

OFFICIAL SEAL
Signature Bernadette Ortiz
BERNADETTE ORTIZ
NOTARY PUBLIC-NEW MEXICO
NOTARY BOND FILED WITH SECRETARY OF STATE
My Commission Expires 12-18-93

CLA-22-A (R-1/93) ACCOUNT NUMBER C 81184

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

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

(GW-46) - Sunterra Gas Processing Company, Erick Seelinger, Environmental Engineer, P.O. Box 26400, Albuquerque, New Mexico 87125, has submitted a discharge plan renewal application for their Kutz Canyon Gas Plant located in SW/4 Section 12, NE/4 Section 13, SE/4 Section 14, Township 28 North, Range 11 West, NMPM, San Juan County, New Mexico. Approximately 4,200 gallons of process waste water will be disposed of in an OCD approved double lined evaporation pond with leak detection. The total dissolved solids (TDS) concentrations of the waste water is approximately 1,500 milligrams per liter (mg/l). Groundwater most likely to be affected by any discharge at the surface is shallow perched water with TDS concentrations 8,000 to 18,000 mg/l. Deeper ground water is at a depth of about 200 feet with estimated TDS concentrations between 2,000 and 4,000 mg/l.

(GW-113) - Transwestern Pipeline Co., Larry Campbell, Compliance Environmentalist, P.O. Box 1717, Roswell, New Mexico 88202-1717, has submitted an application for modification of its previously approved discharge plan for its Eunice Compressor Station located in NW/4 Section 27, Township 22, Range 37 East, NMPM, Lea County, New Mexico. The modification consists of the addition of a soils landform for remediation of non-hazardous oil contaminated soils. The landform will be underlain by impermeable plastic and bermed to prevent runoff of contaminants. Ground most likely to be affected by any accidental spills is at depth of approximately 50 feet with a total dissolved solids concentration of about 1,500 mg/l. The modification addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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

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

GIVEN under the Seal of the New Mexico Conservation Commission at Santa Fe, New Mexico, on this 10th day of May, 1993.

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

Journal: May 22, 1993

Affidavit of Publication

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

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

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

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

And that the cost of publishing said notice is the sum of $ 36.99 which sum has been (Paid) (Assessed) as Court Costs

Joyce Clemens

Subscribed and sworn to before me this 25th day of May, 19 93

Notary Public, Lea County, New Mexico

My Commission Expires Sept. 28, 19 94

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

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(GW-45) - Sunterra Gas Processing Company, Erick Seelinger, Environmental Engineer, P.O. Box 26400, Albuquerque, New Mexico 87125, has submitted a discharge plan renewal application for their Kutz Canyon Gas Plant located in SW/4 Section 12, NE/4 Section 13, SE/4 Section 14, Township 28 North, Range 11 West, NMPM, San Juan County, New Mexico. Approximately 4,200 gallons of process waste water will be disposed of in an OCD approved double lined evaporation pond with leak detection. The total dissolved solids (TDS) concentrations of the waste water is approximately 1,500 milligrams per liter (mg/l). Groundwater most likely to be affected by any discharge at the surface is shallow perched water with TDS concentrations 8,000 to 18,000 mg/l. Deeper ground water is at a depth of about 200 feet with estimated TDS concentrations between 2,000 and 4,000 mg/l.

(GW-113) - Transwestern Pipeline Co., Larry Campbell, Compliance Environmentalist, P.O. Box 1717, Roswell, New Mexico 88202-1717, has submitted an application for modification of its previously approved discharge plan for its Eunice Compressor Station located in NW/4 Section 27, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico. The modification consists of the addition of a soils landfarm for remediation of non-hazardous oil contaminated soils. The landfarm will be underlain by impermeable plastic and bermed to prevent runoff of contaminants. Groundwater most likely to be affected by an accidental spill is at a depth of approximately 50 feet with a total dissolved solids concentration of about 1,500 mg/l. The modification addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 10th day of May, 1993.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
WILLIAM J. LEMAY,
Director
(SEAL)

Published in the Lovington Daily Leader May 19, 1993.

NOTICE OF PUBLICATION

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

Notice is hereby given that pursuant to the New Mexico Water Quality Control Commission Regulations, the following discharge plan 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:

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(GW-113) - Transwestern Pipeline Co., Larry Campbell, Compliance Environmentalist, P.O. Box 1717, Roswell, New Mexico 88202-1717, has submitted an application for modification of its previously approved discharge plan for its Eunice Compressor Station located in NW/4 Section 27, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico. The modification consists of the addition of a soils landfarm for remediation of non-hazardous oil contaminated soils. The landfarm will be underlain by impermeable plastic and bermed to prevent runoff of contaminants. Groundwater most likely to be affected by any accidental spill is at a depth of approximately 50 feet with a total dissolved solids concentration of about 1,500 mg/l. The modification addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 10th day of May, 1993.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

William J. LeMay

SEAL

WILLIAM J. LEMAY, Director

Phone (505) 623-2761
FAX (505) 625-8060

Transwestern Pipeline Company
TECHNICAL OPERATIONS
P. O. Box 1717 • Roswell, New Mexico 88202-1717

OIL CONSER... ON DIVISION
AM 9 29

Roswell, New Mexico
May 7, 1993

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

Re: Landfarm at Eunice Compressor Station

Dear Mr. Anderson

Transwestern Pipeline Company request a permit to construct and operate a landfarm located at it's Eunice Compressor Station (Northern Natural Facility), a semi-remote facility located in Lea County. This facility occurs in the exemption area for oil and gas exploration and production and is located at the following coordinates:

Township 22 South, Range 37 East, Northwest 1/4 of Section 27, Lea County, New Mexico

This request is addressed to specifically landfarm non-hazardous hydrocarbon contaminated soil generated at field operations owned or operated by Transwestern Pipeline Company in Lea County, New Mexico.

This landfarm is to be constructed within the facility property. A six foot chain link fence presently surrounds the property. The anticipated dimensions of the soil remediation cell is to be 200' by 100' with the amount of soil to be placed into this landfarm cell to be approximately 740 cubic yards. A review of the groundwater conditions at this site indicates the depth to a non-potable water table at the station site to be at 40 feet to 50 feet. As a barrier to vertical migration of liquids, the soil cell is underlain by two layer of six mill thick visqueen plastic.

The following site requirements will be adhered in the construction and operation of the landfarm.

1) A berm of approximately 24 inches will be constructed around the entire soil cell area to prevent surface runoff and potential contamination to adjacent areas.

2) Soils to be remediated will be initially layed down and limited to 12 inches in depth. Subsequent lifts will only be applied after analyses have been performed of the surface in-place material and submitted to the O.C.D. for approval.

3) Disking will be preformed bi-monthly to expedite the remediation processes.

4) In the event remediation processes are hindered, fertilizer will be utilized to accelerate the remediation process.

5) This land farm will be operated effectively to reduce fugitive dust emissions to the greatest extent possible.

6) The soil refutation cell will be constructed so that any free water can accumulate and be collected, tested and properly disposed. Disposal of the oily waste water will be by :

   Mesa Oil Co.
   4701 Broadway SE
   Albuquerque, New Mexico 87105

   Rollins Environmental Services
   P.O. Box 609
   Deer Park, Texas 77356

Under this permit, we are additionally requesting that options be discussed to replace or dispose of the soil once contamination levels are below target values assigned by the O.C.D. This will allow for long term use of the landfill site and decrease the potential for environmental liability.

We would like to start the process of performing soil cleanup operations and remediation and would appreciate your attention in this matter.

If you may require any additional information in this matter, please contact me at (505) 625-8022.

Sincerely,

Larry Campbell
Compliance Envrionmentalist

cc: Greg McIlwain
Ronnie Robbins
Jim Myers
file

FENCE

PROPOSED LAND FARM SITE

N

STATION DISCHARGE

4" BLOWDOWN

COMPRESSOR COOLING

COOLING TOWER

COOLING TOWER

DRAIN TANK

WATER SURGE TANK

PUMPS

NORTH CONTAINMENT 44'x22'x2'

WAREHOUSE

OFFICE BLDG

WAREHOUSE

ROADWAY

STORAGE AREA

ENGINE No. 4

ENGINE No. 3

ENGINE No. 2

ENGINE No. 1

LEASE OIL TANKS

LEECH FIELD

24" SUCTION

10" DISCHARGE

GLYCOL TANKS

GAS COOLING TOWER

DOCK AREA

METER BLDG

OILY WASTE WATER TANK

SOUTH CONTAINMENT 36'x60'x2'

P.L. or Sta. Account No. EUNICE STATION				W.O. N.A.			19 — Construction				
Micrfilm File No.	Mfilm. By	Date		Dr. By EC	Date 3-92		Scale N.A.				
Revision – Description	By	App.		Dwg. Stat.	Ckd. By	Date	App. By	Date	App. By	Date	
DISCHARGE PLAN				Prel'y.							
				Bid							
				Const.							

ENRON
Gas Pipeline Operating Company
Houston, Texas

NEW MEXICO
EUNICE COMPRESSOR STA.
PLOT PLAN
LEA COUNTY
NW 1/4 SEC 28 T22S R37E

ENRON GAS PIPELINE GROUP

CHF. ENG.

VICE PRES.

OPER. CO.

DWG. NO.

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 12/29/92,
or cash received on 12/31/92 in the amount of $ 1380.00
from Transwestern Pipeline Corp
for Eunice Compressor Station (Facility Name) GW-113 (DP No.)
Submitted by: _____ Date: _____
Submitted to ASD by: Kathy Brown Date: 12/31/92
Received in ASD by: Timothy C. Montoya Date: 12/31/92
Filing Fee ____ New Facility X Renewal ____
Modification ____ Other _____ (specify)

Organization Code 521.07 Applicable FY 93

To be deposited in the Water Quality Management Fund.

Full Payment X or Annual Increment ____

CHECK NO. [redacted]

TRANSWESTERN PIPELINE COMPANY
P.O. BOX 1188
HOUSTON, TEXAS 77251-1188

DATE OF CHECK
DECEMBER 29, 1992

ENRON CORP

PAY EXACTLY **ONE THOUSAND THREE HUNDRED EIGHTY & NO/100** DOLLARS **$1,380.00**
This check is VOID unless printed on BLUE background

PAY TO THE ORDER OF
NMED - WATER QUALITY MANAGEMENT
OIL CONSERVATION DIVISION
P. O. BOX 2088
SANTA FE, NEW MEXICO 87504

M.J. Oliver

NOT VALID OVER $5,000 UNLESS COUNTERSIGNED

UNITED BANK OF GRAND JUNCTION

[redacted]

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

December 17, 1992

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

Payment Approval

060	8500	999	161	5173
CO	MAJOR	SUB	DETAIL	RC

SUBLEDGER/WAREHOUSE # | VEHICLE #/STOCK SYMBOL

WORK ORDER | PROPERTY UNIT | COST CATEGORY

DESCRIPTION: discharge plan fees

SIGNATURE: N. B. Allen DATE: 12-29-92

CERTIFIED MAIL
RETURN RECEIPT NO. P-667-241-927

Mr. Larry T. Campbell
Transwestern Pipeline Company
P.O. Box 1717
Roswell, New Mexico 88202-1717

RE: Fees for Discharge Plans
GW-90, GW-95, GW-109, GW-113, GW-89

Dear Mr. Campbell:

Pursuant to the New Mexico Water Quality Control Commission (WQCC) Regulation 3-114 "every billable facility submitting a discharge plan for approval, modification or renewal shall pay the fees specified in this section to the Water Quality Management Fund". Every billable facility submitting a new discharge plan will be assessed a filing fee plus either a flat fee or discharge fee. Every billable facility submitting a discharge plan modification will be assessed a filing fee and the flat fee/discharge fee may be waived at the Director's discretion.

The discharge plans listed below were previously approved by the OCD Director. Our records show that the $50 filing fee has been paid, but the flat fee has not been paid. The flat fee for compressor stations with a maximum horsepower greater than 3000 is $1380. Please submit the flat fees for the following compressor stations or records showing that these fees have been paid.

Portales P-1 Compressor Station (GW-90)
Laguna Compressor Station (GW-95)
Carlsbad Compressor Station (GW-109)
Eunice Compressor Station (GW-113)

The flat fee for an approved discharge plan may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the discharge plan, with the first payment due at the time of approval.

In addition, the discharge plan modification for the Corona Compressor Station (GW-89) was approved by the Director on August 17, 1992. Our records show that a filing fee was not submitted with the application for modification. Please submit the $50 filing fee or records showing that the fee has been paid. The flat fee for the Corona Compressor Station discharge plan modification has been waived.

Please make all checks payable to: **NMED - Water Quality Management** and addressed to the OCD Santa Fe Office. If you have any questions, please do not hesitate to contact me at (505) 827-5884.

Sincerely,

Kathy M. Brown
Geologist

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

December 17, 1992

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

CERTIFIED MAIL
RETURN RECEIPT NO. P-667-241-927

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Transwestern Pipeline Company
P.O. Box 1717
Roswell, New Mexico 88202-1717

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Carlsbad Compressor Station (GW-109)
Eunice Compressor Station (GW-113)

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Sincerely,

Kathy M. Brown
Geologist

STATE OF NEW MEXICO

ENERGY, MINERALS AND NATURAL RESOURCES DEPARTMENT

OIL CONSERVATION DIVISION

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

June 19,1992

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

CERTIFIED MAIL
RETURN RECEIPT NO. P-670-683-674

Mr. Larry T. Campbell
Transwestern Pipeline Company
P. O. Box 1717
Roswell, New Mexico 88202-1717

RE: Discharge Plan GW-113
Eunice Compressor Station
Lea County, New Mexico

Dear Mr. Campbell:

The groundwater discharge plan GW-113 for the Transwestern Pipeline Company Eunice Compressor Station located in the NE/4, Section 27, Township 22 South, Range 37 East, NMPM, Lea County, New Mexico **is hereby approved** under the conditions contained in the enclosed attachment. The discharge plan consists of the application dated April 21, 1992.

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 amendments 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.

Please be advised that all compressor stations that are in excess of twenty five (25) years of age must have all underground waste piping tested for integrity prior to discharge plan renewal. You must submit the results of this testing prior to your renewal date.

Pursuant to Section 3-109.G.4., this plan approval is for a period of five years. This approval will expire June 19, 1997, and you should submit an application for renewal in ample time before that date.

The discharge plan application for the Transwestern Pipeline Company Eunice Compressor Station is subject to the WQCC Regulation 3-114 discharge plan fee. Every billable facility submitting a discharge plan will be assessed a fee equal to the filing fee of fifty (50) dollars plus the flat rate of one-thousand three-hundred and eighty (1380) dollars for compressor stations in excess of 3000 Horsepower .

The OCD has received your $50 filing fee. The flat fee for an approved discharge plan may be paid in a single payment due at the time of approval, or in equal annual installments over the duration of the plan, with the first payment due upon receipt of this approval.

Please make all checks payable to: **NMED-Water Quality Management** and addressed to the OCD Santa Fe Office.

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

Sincerely,

William J. LeMay
Director

WJL/rca

xc: Chris Eustice - OCD Hobbs

ATTACHMENT TO DISCHARGE PLAN GW-113 APPROVAL
TRANSWESTERN PIPELINE EUNICE COMPRESSOR STATION
DISCHARGE PLAN REQUIREMENTS
(June 19, 1992)

1. Payment of Discharge Plan Fees: The $1380 flat fee (either total payment or installment) will be paid upon receipt of this approval.

2. Drum Storage: All drums will be stored on pad and curb type containment.

3. Sump Inspection: All pre-existing sumps at this facility will be cleaned and visually inspected on an annual basis. Any new sumps or below-grade will be approved by the OCD prior to installation and will incorporate leak detection in their designs.

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

May 29, 1992

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

Dear Mr. Lemay:

This responds to the notice of publication dated April 29, 1992, regarding the Oil Conservation Division discharge permit applications GW-113, GW-104, GW-105, GW-112, GW-116, GW-117, and GW-118 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, plants, or animals that will be adversely affected by the following discharges.

GW-113 - Transwestern Pipeline Company Eunice Compressor Station located in the NW 1/4 of Section 27, T22S, R37E, Lea County, New Mexico.

GW-104 - Yates Petroleum Corporation Algerita Compressor Station located in the SE 1/4, NE 1/4 of Section 16, T20S, R24E, Eddy County, New Mexico.

GW-105 - Yates Petroleum Corporation Larue Compressor Station located in the SE 1/4, NW 1/4 of Section 3, T20S, R24E, Eddy County, New Mexico.

GW-112 - Williams Field Services C.D.P. Alt. #1 Compressor Station located in the SE 1/4, NW 1/4 of Section 34, T32N, R5W, Rio Arriba County, New Mexico.

GW-116 - Williams Field Services San Juan 32-8 No. 3 CDP Compressor Station located in the SE 1/4, NE 1/4 of Section 9, T31N, R8W, San Juan County, New Mexico.

GW-117 - Williams Field Services San Juan 32-7 No. 1 CDP Compressor Station located in the SW 1/4, SW 1/4 of Section 34, T32N, R7W, San Juan County, New Mexico.

GW-118 - Williams Field Services San Juan 31-6 No. 1 CDP Compressor Station located in the SW 1/4, SW 1/4 of Section 1, T30N, R6W, Rio Arriba County, New Mexico.

If you have any questions concerning our comments, please contact Laurie S. Shomo at (505) 883-7877.

Sincerely,

Jennifer Fowler-Propst
Field Supervisor

cc:
Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico
Regional Director, U.S. Fish and Wildlife Service, Fish and Wildlife Enhancement, Albuquerque, New Mexico.

STATE OF NEW MEXICO
County of Bernalillo ss

OIL CONSERVATION DIVI
RECEIVED
'92 MAY 15 AM 8

Thomas J. Smithson being duly sworn declares and says that he is National Ad
manager of the **Albuquerque Journal**, and that this newspaper is duly qu
publish legal notices or advertisements within the meaning of Section 3, Ch
Session Laws of 1937, and that payment therefore has been made or assesse
costs; that the notice, a copy of which is hereto attached, was published in s
in the regular daily edition,

for 1 times, the first publication being on the 14

of May, 1992, and the subsequent cons

publications on

Thomas J. Smithson

Sworn and subscribed to before me, a Notary Pu
and for the County of Bernalillo and State of Ne
Mexico, this 14 day of May

PRICE $65.10

Statement to come at end of month.

CLA-22-A (R-12/92) ACCOUNT NUMBER C 81184

Bernadette Ortiz

12-18-93

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

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

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(GW-104) - Yates Petroleum Corporation, Chuck Morgan, Compliance Engineer, 105 South 4th Street, Artesia, New Mexico 88210, has submitted a discharge plan application for their Algerita Compressor Station located in the SE/4, NE/4, Section 16, Township 20 South, Range 24 East, NMPM, Eddy County, New Mexico. Approximately 10 gallons per day of wastewater is piped to a field tank battery prior to disposal in an OCD permitted Class II disposal well. Groundwater most likely to be affected by an accidental discharge is at a depth of approximately 250 feet with a total dissolved solids concentration of approximately 1500 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 29th day of April, 1992.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
WILLIAM J. LEMAY, Director

Journal: May 14, 1992

Affidavit of Publication

No. 13940

STATE OF NEW MEXICO,

County of Eddy:

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

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

First Publication May 7, 1992

Second Publication

Third Publication

Fourth Publication

Gary D. Scott

Subscribed and sworn to before me this 7th day of May 19 92

Notary Public, Eddy County, New Mexico

My Commission expires September 23, 1996

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

SEAL

Published in the Artesia Daily Press, Artesia, N.M. May 7, 1992.

Legal 13940

LEGAL NOTICE

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

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Affidavit of Publication

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

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

That the notice which is hereto attached, entitled

Notice Of Publication

and numbered ..... in the ..... Court of Lea County, New Mexico, was published in a regular and entire issue of THE LOVINGTON DAILY LEADER and not in any supplement thereof, once each week for the same day of the week, for one (1) day beginning with the issue of

May 6, 19 92

and ending with the issue of

May 6, 19 92

And that the cost of publishing said notice is the sum of $ 29.42

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

Joyce Clemens

Subscribed and sworn to before me this 13th day of May, 19 92

Mrs. Jean Denier

Notary Public, Lea County, New Mexico

My Commission Expires Sept. 28, 19 94

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

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STATE OF NEW MEXICO
OIL CONSERVATION DIVISION
WILLIAM J. LEMAY,
Director

SEAL

Published in the Lovington Daily Leader May 6, 1992.

NOTICE OF PUBLICATION

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STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

S E A L

WILLIAM J. LEMAY, Director

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No [redacted] dated 4/21/92,

or cash received on 4/23/92 in the amount of $ 50.00

from Transwestern Pipeline Co.

for Eunice Compressor Station (Facility Name) GW-113 (DP No.)

Submitted by: _____ Date: _____

Submitted to ASD by: Kathy Brown Date: 4/23/92

Received in ASD by: Dorothy C. Montoya Date: 4/23/92

Filing Fee X New Facility ____ Renewal ____

Modification ____ Other _____ (specify)

Organization Code 521.07 Applicable FY 80

To be deposited in the Water Quality Management Fund.

Full Payment ____ or Annual Increment ____

CHECK NO. [redacted]

TRANSWESTERN PIPELINE COMPANY
P.O. BOX 1188
HOUSTON, TEXAS 77251-1188

DATE OF CHECK APRIL 21, 1992

ENRON CORP

PAY EXACTLY FIFTY DOLLARS AND NO/100 ---------- DOLLARS $50.00

This check is VOID unless printed on BLUE background

PAY TO THE ORDER OF
NMED - WATER QUALITY MANAGEMENT
OCD
P.O. BOX 2088
SANTA FE, NM 87504-2088

[signature]

NOT VALID OVER $5,000 UNLESS COUNTERSIGNED

UNITED BANK OF GRAND JUNCTION

[redacted]

CHECK NO. [redacted]

REMITTANCE STATEMENT

VOUCHER NO.	INVOICE DATE	INVOICE NUMBER	PURCHASE ORDER	AMOUNT		
				GROSS	DISCOUNT	NET
	4/21/92	MISC042192				

Special Instructions

DISCHARGE PLAN APPLICATION - EUNICE COMRPESSOR STATION

P. O. BOX 1188, HOUSTON,TEXAS 77251-1188

DETACH STATEMENT BEFORE DEPOSITING ENDORESMENT OF CHECK ATTACHED ACKNOWLEDGES PAYMENT IN FULL OF ALL ITEMS SHOWN ABOVE. IN CASE OF ERROR OR OMISSION RETURN BOTH CHECK AND STATEMENT

011-E1151 12/88

Phone (505) 623-2761
FAX (505) 625-8060

Transwestern Pipeline Company
TECHNICAL OPERATIONS
P. O. Box 1717 • Roswell, New Mexico 88202-1717

April 21, 1992

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

Re: Discharge Plan Application
Transwestern Pipeline Company
(Operating Company)
Eunice Compressor Station
(Northern Natural Gas Facility)
Lea County, New Mexico

Dear Mr. Anderson:

The discharge plan application for the above referenced facility is being presented to your agency on behalf of Transwestern Pipeline/Northern Natural Gas Company. if you require any additional information or clarification, please contact me at (505) 625-8022.

I. General Information

A. Discharger/Leagally Responsible Party

Name: Transwestern Pipeline Company
Eunice Compressor Station
Attn: Bob Anderson

Address: Hobbs District Office
2626 West Marland
Hobbs, New Mexico 88240
(505) 397-6000

B. Local Representative or Contact Person

Mr. Greg McIlwain, Plant and Compression Supervisor

c. Location of Discharge

Legal Description: Township 22 South, Range 37 East, Northwest 1/4 of Section 27, Lea County, New Mexico.

A state of New Mexico map of the immediate site vacinity and a plot plan showing location of discharge, compressor station equipment and other site information required below are attached in APPENDIX A.

Note: All onsite routine operational discharges are to sumps or an above-ground tank with subsequent transfer offsite by an appropriate disposal company. No onsite discharges are intentionally allowed to enter surface waters or groundwater.

D. Type of Natural Gas Operation

This mainline compressor station provides compression for the transmission of natural gas in the Northern Natural Gas system. It receives natural gas from the Eunice Texaco processing plant then compresses the gas north to Northern Natural Gas Plains Station or south to Northern Natural Gas Kermit Station.

E. Copies

Three copies of the discharge plan application are enclosed.

F. Affirmation

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

Sincerely,

Larry T. Campbell
Compliance Environmentalist

LTC/EEC

3 copies

cc: Greg McIlwain w/attach
Bob Anderson w/o attach
Doc Alpers w/o attach
File w/attach

II. Plant Facilities

A. Sources and Quantities of Effluent and Plant Fluids
For each source, primary quality type (e.g., high TDS water, hydrocarbons, washwater, sewage), estimated quantities, and major additives, if any are provided.

1. Scrubbers: The incoming gas stream to this facility contains few liquids in the form of natural gas pipeline liquids. The liquids carried in the natural gas stream are liquids used in the processing of natural gas (m.e.a.). These entrained liquids are then removed by the operation of the one (1) onsite inlet scrubber then directed to the 500 bbl oily waste water tank. (This tank in currently being replace with a 110 bbl. tank and relocated into the south containment area.) Twenty five (25) gal/day of pipeline liquids is collected by this system.

2. Engines and cooling waters: The engine and cooling water stream is collected and reclaimed for reuse.

3. Domestic Sewage: Sewage is directed to the onsite septic tank. The effluent from the tank is then directed to distribution box and then to the leech field. There is one leech field located on the station property. The small leech field services the shop restroom and shower. This septic system is completely separate from the operational practices at this facility.

4. Engine Wash Down Water and Floor Drains: Wastewater collected from cleaning and washdown operations are directed to a series of floor drains and collected into a 10 bbl. sump. The effluent is then pumped to a 500 bbl. oily waste water tank. (This tank is currently being replaced with a 110 bbl. tank and being relocated into the south containment area.) Only approved biodegradable solvents (i.e. epa 2000) are used in this process. The liquids stored in the 500 bbl. tank are tested for H.W. characterization prior to being removed by a wastewater hauler for proper disposal. There are no other waste streams which presently enter this system. Truck washing operations are not performed at this facility. Twenty five (25) gallons/day of oily waste water is collected by this system.

5. Waste engines Oils: Lubricative oil changeouts from the four Ingersoll Rands are collected into a dedicated sump and into a 40 bbl. used oil tank. Prior to removal from this facility samples are analyzed from the tank for proper recycling or recovered as boiler fuel makeup.

6. Air Compressor Water Drain Tank: This is collected in a 130 gallon tank and is use to collect the condensate from the compressed air storage tanks.

   Chemical materials stored onsite in excess of 55 gallons may include: gear and engine oil, ethylene glycol, methanol, gasoline, diesel, biodegradable soap and solvent, steam cleaner degreaser.

B: Quality Characteristics

Characteristics of the individual waste streams are as follows: All waste streams are being separated and segregated into dedicated sumps and tanks.

1. Pipeline Liquids: The natural gas pipeline condensate at this site is collected in a 500 bbl. tank (currently being replaced with a 110 bbl. tank and relocated to the south containment area) liquids are sampled and appropriately disposed of. (APPENDIX B)

2. Engine Cooling Water: Coolant consists of a pre-mixed solution of ambitrol and water. MSDS information is attached in APPENDIX C.

3. Used Engine Oil: Prior to removal from the facility for recycling, this material is sampled as per 40 CFR 266.

4. Floor Drains: Floor drains which collect washdown cleaning water and engine or engine parts degreasing is directed to a sump outside the engine room. From there, the wastewater is directed to the 500 bbl. oily waste water tank (tank is currently being replaced with a 110 bbl. tank and being relocated to south containment area) where the tank liquids are sampled and appropriately disposed. (see APPENDIX D)

C. Transfer and Storage of Fluids and Effluent

1. Water and wastewater plan schematics are not applicable because no individual water treatment units exist. Liquid wastes are not discharged onsite. All liquid wastes are temporarily stored in sumps and tanks until they are transferred offsite.

2. Potential surface and groundwater contaminants, which may be discharged within the compressor station would be associated with sumps, above ground storage tanks and connecting ground pipes. Sumps and tanks are inspected weekly and monthly. All tanks have been engineered to be usually inspected for tank leakage and contained in concrete secondary containment which complies with the OCD requirement for 130 % containment storage.

   ** Tanks are currently being replaced and relocated to two containment areas. The following information is based on new tanks sizes and the relocated area.

   a. Oily wastewater tank -110 bbl. capacity, steel walled; contains liquids received from sumps associated with engine washdown, parts cleaning. Liquids are sampled prior to removal.

   b. Used lubrication oil storage tank- 40 bbl. capacity, steel walled; contains used crankcase and gear oil. Liquids are sampled prior to removal.

   c. Oil storage tank - 6000 gallon capacity, containing citco pacemaker 1000.

   d. Pipeline liquids tank - 110 bbl. capacity, steel walled; contains liquids received from the inlet scrubber. Liquids are sampled prior to removal.

   e. Distance piece drain tank - 40 bbl. capacity, steel walled; contains waste oil collected from the compressor distance pieces. Liquids are sampled prior to removal.

f. Oil rundown tank - 50 bbl. capacity, steel walled; used to collect compressor unit oil during maintenance.

g. Water rundown tank - 50 bbl. capacity, steel walled; used to collect compressor unit cooling water during maintenance.

h. Glycol tanks - Two tanks, 2053 gallons capacity each, steel walled; used to store anti-freeze.

i. Valve top oil tank - 955 gallons capacity, steel walled; used to store compressor valve top oil.

j. Compressor cooling anti-freeze storage tank - 2190 gallons capacity, steel walled; used to store compressor cooling mixture.

k. Compressor cooling surge tank - 50 bbl. capacity, steel walled; used to hold the compressor cooling system mixture.

l. Air compressor drain tank - 680 gallons capacity, fiberglass; holds condensate collected from the compressed air system. Liquids are sampled prior to removal.

3. Underground wastewater pipes, their age and specification (i.e., wall thickness, fabrication material), are:

a. All underground pipes are designed and constructed according to Northern Natural's specification. They are made of coated steel and connected to the facility rectifier system for corrosion control. The existing underground pipes were installed in 1960.

D. Spill/Leak Prevention and Housekeeping Procedures

1. SPCC Plan: Procedures addressing spill containment and cleanup, including proposed schedule for OCD notification of spills will be described in the facility's contingency plan (SPCC). This document is in preparation and will be submitted to the OCD as it is finalized. Disposition of the liquid materials is as follows:

a. Pipeline liquids and rainwater:

Enron Oil Trading and Transportation (EOTT)
P.O. Box 2297
Midland, Texas 79702
(915) 687-0783

Rollins Environmental Services
P.O. Box 609
Deer Park, Texas 77536
(713) 930-2300

b. Oily wastewater:

Mesa Oil Co.
4701 Broadway SE
Albuquerque, New Mexico 87105
(505) 877-8855

Enron Oil Trading and Transportation
P.O.Box 2297
Midland, Texas 79702
(915) 687-0783

c. Used lubrication and gear oil:

Mesa Oil Co.
4701 Broadway SE
Albuquerque, New Mexico 87105
(505) 877-8855

d. Used filters:

Waste Management of Southeast New Mexico
2608 Lovington Highway
Hobbs, New Mexico 88240
(505) 392-6571

e. Other solid waste:

Waste Management of Southeast New Mexico
2608 Lovington Highway
Hobbs, New Mexico
(505) 392-6571

2. Housekeeping: Precipitation runoff is directed from the station facility. Cleanup and remediation of minor oil releases is addressed in section IIb1. Information on curbs, berms, drains and secondary containment are discussed in section IIC2, IVC2 and IID1, respectively.

3. Leak Detection: All aboveground tank systems are visually inspected weekly to detect leaks and ensure tank integrity. Visual sump inspections are performed on an annual basis.

4. Well System: The compressor station presently receives their potable water from the Texaco processing plant located directly south of station.

IV. SITE CHARACTERISTICS

a. Site Features

The approximate ten acre site is presently fenced and lighted for security measures. There is approximately 5 feet of relief across the extent of the property, sloping towards the southeast. Major buildings present on the site include office, maintenance and workshop, compressor building, product and storage tanks and containment.

The closest existing residential development is the town of Eunice, New Mexico located 5 miles to the north.

1. Geology: The geologic formations exposed at the surface of Section 27 are the Teriary Ogallala and the Quaternary Alluvium. The Ogallala is a semiconsolidated fine grained, calcareous sand, capped with a thick layer of caliche, and containing some clay, silt, and gravel. Its thickness is up to 300 feet. The overlying Quaternary Alluvium is comprised of channel and lake deposits, alternating thick bedded calcareous silt, fine sand, and clay. Its thickness is up to 400 feet regionally, but is generally less than 100 feet thick. The alluvium and Ogallala are overlain by up to 30 feet of fine-to-medium grained dune sand.

2. Soils: The Eunice plant site is comprised predominantly of Tonuco loamy fine sand. The soil typically ranges in depth from 10 to 20 inches over indurated caliche. Its permeability is very rapid. runoff is very slow, and water intake is rapid. Slopes at the site are nearly 0 percent.

The remaining area of section 27 addditionally includes Pyote and Maljamar fine sands, Simona fine sandy loam, and Berino-Cacique loamy fine sands. Pyote and Maljamar soils ate typically 60 and 50 inches in depth, respectively, are moderately permeable, and experience very slow runoff.

Simona fine sandy loam is normally 16 inches deep, has moderately rapid permeability and slow to medium runoff. Indurated caliche is present immediately below the soil.

Berino-Cacique loamy fine sands are moderately permeable, with very slow runoff and rapid water intake. The berino soil is greater than 5 feet in depth. Carique is typically 28 inches deep.

3. Vegetation: The vegetation of the area is typical for the climate and site aspect present at the facility. The native vegetation is mainly mid grasses, forbs, and shrubs. Dominant vegetation is gamma grass, bur grass, and mesquite.

A. Hydrologic features

1. Bodies of Water: There are no bodies of water located within the vacinity of the facility.

2. Depth to Groundwater: The major water bearing formation of the area is the Tertiary Ogallala Formation. Secondarily, the Quaternary Alluvium provides potable water to wells. Water table contour elevation in the vicinity of Eunice plant is between 3275 feet and 3300 feet. Locally, the water table gradient is to the southeast. Based on 1961 data, water levels within a 2-mile radius of the Eunice plant range from 50 to 81 feet. Well depths range from 69 feet to 229 feet. According to records in the U.S. Geological Survey ground water site inventory file, there are 351 water supply well within an approximate 10 mile radius of the Eunice Plant.

Southern Lea County is an important recharge area but little natural recharge takes place there. Recharge is largely by infiltration from short drainageways and temporary lakes that form in shallow depressions after heavy rains.

3. Water Chemistry: Potable water for the facility is received from the Texaco processing plant (APPENDIX E)

C. Flood Protection

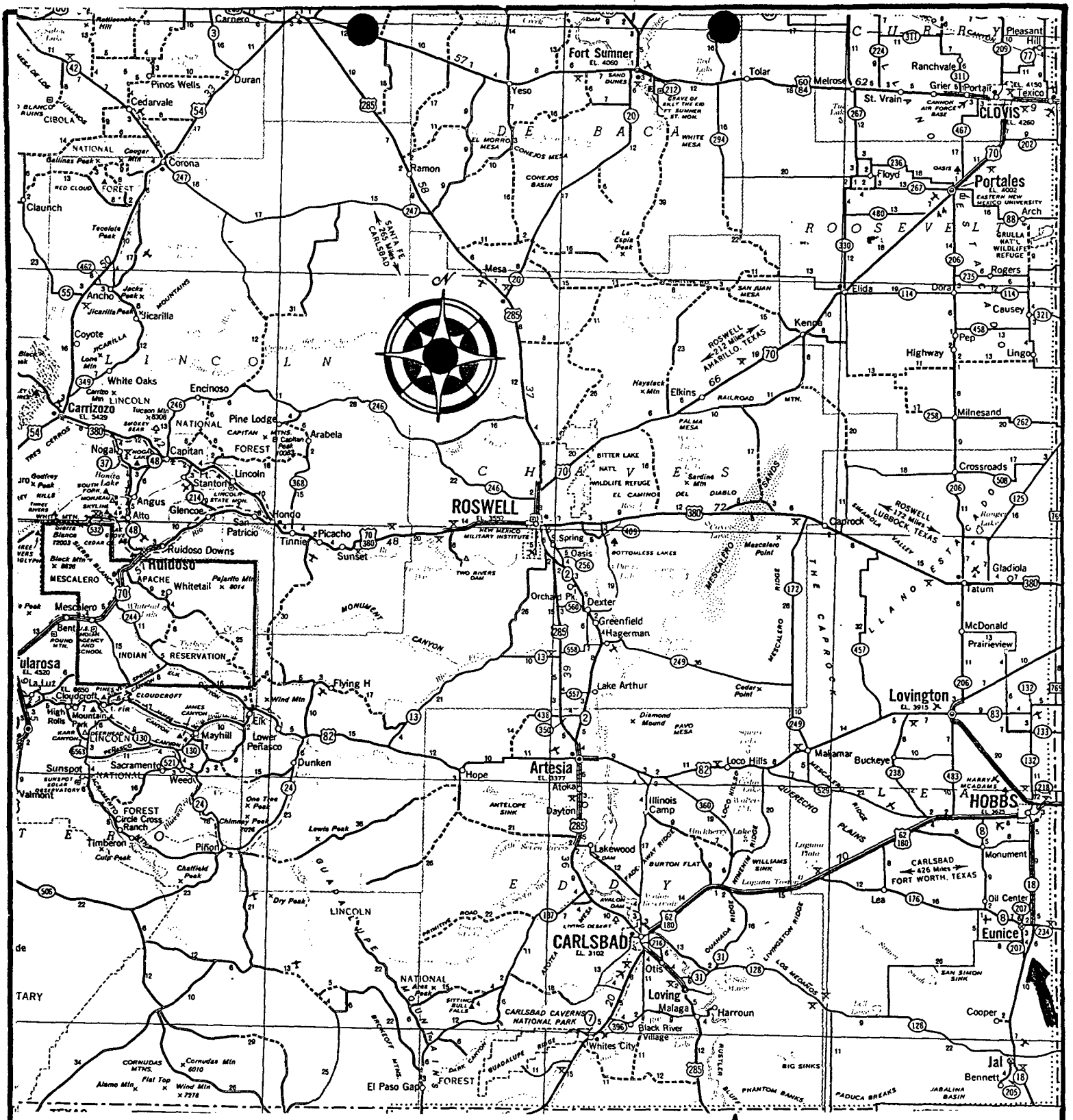
1. Flood Potential: There is no known record or indication of flooding onsite.

2. Flood Protection: Curbs, berms and culverts have been constructed.

V. ADDITIONAL INFORMATION

To be provided as requested.

APPENDIX A



TRANSWESTERN PIPELINE COMPANY

DATE:	SCALE:
DRAWN BY	APPROVED
CHECKED BY	BOOK NO.
APPROVED	DRAWING NO.

N

STATION DISCHARGE

8" BLOWDOWN

COMPRESSOR COOLING

COOLING TOWER

COOLING TOWER

BRAW TANK *

WATER SURGE TANK

PUMPS

AIR COMP. ORAIN TA. *

NORTH CONTAINMENT 44x26x2

WAREHOUSE

OFFICE BLDG

WAREHOUSE

ROADWAY

LUBE OIL TANK *

LEECH FIELD

STORAGE AREA

ENGINE NO. 4

ENGINE NO. 3

ENGINE NO. 2

ENGINE NO. 1

24" SUCTION

10" DISCHARGE

GLYCOL TANKS *

GAS COOLING TOWERS

DOCK AREA

METER BLDG.

JACKET WATER COOLING TOWERS

OILY WASTE WATER TANK *

SOUTH CONTAINMENT 36x60x2

2-12" METER RUNS

INLET SCRUBBER

FROM TEXACO PLANT

* TANKS BEING REPLACED AND RELOCATED TO NORTH OR SOUTH CONTAINMENT AREA

P.L. or Sta. Account No. EUNICE STATION				W.O. N.A.			19 — Construction					
Micrfilm File No.	Mflm. By	Date		Dr. By EC	Date 3-92		Scale N.A.					
Revision – Description	By	App.		Dwg. Stat.	Ckd. By	Date	App. By	Date	App. By	Date		
DISCHARGE RUN				Prel'y.								
				Bid								
				Const.								

ENRON
Gas Pipeline Operating Company
Houston, Texas

NEW MEXICO
EUNICE COMPRESSOR STA.
PLOT PLAN
LEA COUNTY
NW 1/4 SEC 26 T22S R37E

ENRON GAS PIPELINE GROUP

CHF. ENG.
VICE PRES.
OPER. CO.
DWG. NO.

BRUNING, 40-22 302450

APPENDIX B

ASSAIGAI
ANALYTICAL LABORATORIES, INC. • 7300 Jefferson, N.E. • Albuquerque, New Mexico 87109
3711 Admiral, Suite C • El Paso, Texas 79925

TEST RESULTS BY SAMPLE

Sample: 01A EUNICE OILY W/W 3-023 Collected: 03/12/92

Test Description	Result	Limit	Units	Analyzed	By
FLASHPOINT (ENRON)	>140	60	DEGREES FAREN	03/23/92	JEB
TOTAL DISSOLVED SOLID	1900	1.0	MG/L	03/17/92	RF

Sample: 01B EUNICE OILY W/W 3-024 Collected: 03/12/92

Test Description	Result	Limit	Units	Analyzed	By
TCLP EXTRACTION	N/A		N/A		JC
TCLP F SERIES ENRON EXT	N/A		N/A		JC
TCLP F SERIES ENRON LIST#2					
METHYLENE CHLORIDE	ND	0.001	UG/L	03/27/92	NO
1,1,1-TRICHLOROETHANE	ND	0.001	UG/L	03/27/92	NO
TRICHLORO-TRIFLUOROETHANE	ND	0.001	UG/L	03/27/92	NO
ORTHO-DICHLOROBENZENE	ND	0.001	UG/L	03/27/92	NO
TRICHLOROFLUOROMETHANE	ND	0.001	UG/L	03/27/92	NO
XYLENE	ND	0.001	UG/L	03/27/92	NO
ACETONE	ND	10	UG/L	03/27/92	NO
ETHYL ACETATE	ND	10	UG/L	03/27/92	NO
ETHYL BENZENE	ND	0.001	UG/L	03/27/92	NO
ETHYL ETHER	ND	0.001	UG/L	03/27/92	NO
METHYL ISOBUTYL KETONE	ND	0.001	UG/L	03/27/92	NO
n-BUTYL ALCOHOL	ND	10	UG/L	03/27/92	NO

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3711 Admiral, Suite C • El Paso, Texas 79925

Test Description	Result	Limit	Units	Analyzed	By
CYCLOHEXANONE	ND	0.001	UG/L	03/27/92	NO
METHANOL	ND	10	UG/L	03/27/92	NO
TOLUENE	ND	0.001	UG/L	03/27/92	NO
ISOBUTANOL	ND	10	UG/L	03/27/92	NO
Surrogates					
4-BROMOFLUOROBENZENE		Min:	Max:		
1,2-DICHLOROETHANE-d4		Min:	Max:		
TOLUENE-d8		Min:	Max:		
TCLP METALS					
ARSENIC	<0.005	0.005	MG/L		JB
BARIUM	<0.5	0.5	MG/L		JB
CADMIUM	0.004	0.003	MG/L		JB
CHROMIUM	<0.02	0.02	MG/L		JB
LEAD	<0.10	0.10	MG/L		JB
MERCURY	<0.0002	0.0002	MG/L		JB
SELENIUM	<0.005	0.005	MG/L		JB
SILVER	0.02	0.010	MG/L		JB
TCLP ORGANICS ENRON EXT	N/A		N/A		JC
TCLP ORGANICS ENRON LIST#2					
BENZENE	0.160	0.001	MG/L	03/20/92	JS
CARBON TETRACHLORIDE	ND	0.001	MG/L	03/20/92	JS
CHLOROBENZENE	ND	0.001	MG/L	03/20/92	JS
PYRIDINE	ND	0.02	MG/L	03/20/92	JS
1,2-DICHLOROETHANE	ND	0.001	MG/L	03/20/92	JS
1,1-DICHLOROETHYLENE	ND	0.001	MG/L	03/20/92	JS
METHYL ETHYL KETONE	ND	0.001	MG/L	03/20/92	JS
TETRACHLOROETHYLENE	ND	0.001	MG/L	03/20/92	JS
TRICHLOROETHYLENE	0.001	0.001	MG/L	03/20/92	JS

Test Description	Result	Limit	Units	Analyzed	By
VINYL CHLORIDE	ND	0.001	MG/L	03/20/92	JS
O-CRESOL	ND	0.02	MG/L	03/20/92	JS
M-CRESOL	ND	0.02	MG/L	03/20/92	JS
P-CRESOL	ND	0.02	MG/L	03/20/92	JS
1,4-DICHLOROBENZENE	ND	0.02	MG/L	03/20/92	JS
2,4,5-TRICHLOROPHENOL	ND	0.02	MG/L	03/20/92	JS
HEXACHLOROBENZENE	ND	0.02	MG/L	03/20/92	JS
HEXACHLORO-1,3-BUTADIENE	ND	0.02	MG/L	03/20/92	JS
HEXACHLOROETHANE	ND	0.02	MG/L	03/20/92	JS
2,4,6-TRICHLOROPHENOL	ND	0.02	MG/L	03/20/92	JS
PENTACHLOROPHENOL	ND	0.02	MG/L	03/20/92	JS
Surrogates					
NITROBENZENE-d5	63	Min: 35	Max: 114		
2-FLUOROBIPHENYL	54	Min: 43	Max: 116		
TERPHENYL-d14	77	Min: 33	Max: 141		
PHENOL-d5	35	Min: 10	Max: 94		
2-FLUOROPHENOL	53	Min: 10	Max: 123		
TCLP ZERO HEAD EXTRACTION	N/A		N/A		JC
TOTAL DIGESTION (EXT.)	N/A		N/A		DS

APPENDIX C

MATERIAL SAFETY DATA SHEET

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

PRODUCT NAME: AMBITROL (R) FL 50 COOLANT

Effective Date: 06/08/90 Date Printed: 06/27/90 MSDS:000584

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

Ethylene Glycol	CAS# 000107-21-1	47-55%
Diethylene Glycol	CAS# 000111-46-6	<3%
Water	CAS# 007732-18-5	<50%
Dipotassium phosphate	CAS# 007758-11-4	<5%

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: 229F, 109C
VAP. PRESS: Approx. 2.5 mmHg @ 20C
VAP. DENSITY: Not applicable
SOL. IN WATER: Completely miscible
SP. GRAVITY: 1.084 @ 60/60F, 16C
APPEARANCE: Red liquid.
ODOR: Information not available.

3. FIRE AND EXPLOSION HAZARD DATA:

FLASH POINT: None
METHOD USED: PMCC

FLAMMABLE LIMITS
LFL: Not applicable.
UFL: Not applicable.

EXTINGUISHING MEDIA: Water fog, carbon dioxide, dry chemical.

FIRE & EXPLOSION HAZARDS: After 50% of the initial volume has

(Continued on Page 2)

3. FIRE AND EXPLOSION HAZARD DATA: (CONTINUED)

evaporated, the residual solution will burn at temperatures above 290F when exposed to an ignition source.

FIRE-FIGHTING EQUIPMENT: Wear positive-pressure, self-contained breathing apparatus.

4. REACTIVITY DATA:

STABILITY: (CONDITIONS TO AVOID) Not considered to be a problem under normal storage conditions.

INCOMPATIBILITY: (SPECIFIC MATERIALS TO AVOID) Oxidizing material

HAZARDOUS DECOMPOSITION PRODUCTS: After water has volatilized, burning will produce carbon monoxide, carbon dioxide, and water.

HAZARDOUS POLYMERIZATION: Will not occur.

5. ENVIRONMENTAL AND DISPOSAL INFORMATION:

ACTION TO TAKE FOR SPILLS/LEAKS: Small spills: Cover with absorbent material, soak up and sweep into drums for disposal. Large spills: Dike around spill and pump into suitable containers for disposal or reprocessing.

DISPOSAL METHOD: Burn in approved incinerator in accordance with local, state, and federal regulations.

(Continued on Page 3)

6. HEALTH HAZARD DATA:

EYE: Essentially nonirritating to eyes. Vapors or mists may irritate eyes.

SKIN CONTACT: Prolonged or repeated exposure not likely to cause significant skin irritation. May cause more severe response if skin is abraded (scratched or cut).

SKIN ABSORPTION: A single prolonged exposure is not likely to result in the material being absorbed through skin in harmful amounts. The dermal LD50 has not been determined. Repeated skin exposure to large quantities may result in absorption of harmful amounts.

INGESTION: Excessive exposure may cause central nervous system effects, cardiopulmonary effects (metabolic acidosis), and kidney failure. Amounts ingested incidental to industrial handling are not likely to cause injury; however, ingestion of larger amounts could cause serious injury, even death. The oral LD50 for rats is 8200 mg/kg. Single oral dose toxicity is expected to be moderate to humans even though tests with animals show a lower degree of toxicity.

INHALATION: At room temperature, exposures to 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 formation of bladder stones after repeated oral doses of diethylene glycol. Observations in animals include kidney and liver effects and deposition of calcium salts in various tissues after long-term dietary intake of ethylene glycol. Based on data from long-term animal studies, diethylene glycol is not believed to pose a carcinogenic risk to man. Ethylene glycol did not cause

(Continued on Page 4)

6. HEALTH HAZARD DATA: (CONTINUED)

cancer in long-term animal studies. Based on animal studies, ingestion of very large amounts 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 to prevent ingestion) or skin contact, the primary routes of occupational exposure, had minimal or essentially no effect on the fetus. Birth defects are unlikely from exposure to diethylene glycol. Exposures having no adverse effects on the mother should have no effect on the fetus. Diethylene glycol has not interfered with reproduction in animal studies. In studies on rats, ethylene glycol has been shown not to interfere with reproduction. In studies on mice, ingestion of ethylene glycol in large amounts caused a small decrease in the number of litters/pair, live pups/litter, and in live pup weight. Results of in vitro (test tube) mutagenicity tests 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 to an unconscious person.

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

NOTE TO PHYSICIAN: Consult standard literature. Supportive care. Treatment based on judgment of the physician in response to reactions of the patient. In the treatment of intoxication by ethylene glycol, the use of ethanol, hemodialysis and

(Continued on Page 5)

7. FIRST AID: (CONTINUED)

intravenous fluids to control acidosis should be considered. N. Eng. J. Med. 304:21 1981. If burn is present, treat as any thermal burn, after decontamination.

8. HANDLING PRECAUTIONS:

EXPOSURE GUIDELINE(S): ACGIH TLV is 50 ppm ceiling for ethylene glycol.

VENTILATION: Good general ventilation should be sufficient for most conditions. Local exhaust ventilation may be necessary 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 skin and eye contact. Avoid ingestion. Avoid breathing vapors or mists.

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

(Continued on Page 6)

9. ADDITIONAL INFORMATION: (CONTINUED)

expected to create a condition which will result in EO concentrations greater than 0.5 ppm (8 hour TWA) in the breathing zones 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.

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	47 -55 %

CHEMICAL NAME	CAS NUMBER	CONCENTRATION
ETHYLENE GLYCOL	000107-21-1	47 -55 %

APPENDIX D

ASSAIGAI
ANALYTICAL LABORATORIES, INC. • 7300 Jefferson, N.E. • Albuquerque, New Mexico 87109 3711 Admiral, Suite C • El Paso, Texas 79925

TEST RESULTS BY SAMPLE

Sample: 01A EUNICE OILY W/W 3-023 Collected: 03/12/92

Test Description	Result	Limit	Units	Analyzed	By
FLASHPOINT (ENRON)	>140	60	DEGREES FAREN	03/23/92	JEB
TOTAL DISSOLVED SOLID	1900	1.0	MG/L	03/17/92	RF

Sample: 01B EUNICE OILY W/W 3-024 Collected: 03/12/92

Test Description	Result	Limit	Units	Analyzed	By
TCLP EXTRACTION	N/A		N/A		JC
TCLP F SERIES ENRON EXT	N/A		N/A		JC
TCLP F SERIES ENRON LIST#2					
METHYLENE CHLORIDE	ND	0.001	UG/L	03/27/92	NO
1,1,1-TRICHLOROETHANE	ND	0.001	UG/L	03/27/92	NO
TRICHLORO-TRIFLUOROETHANE	ND	0.001	UG/L	03/27/92	NO
ORTHO-DICHLOROBENZENE	ND	0.001	UG/L	03/27/92	NO
TRICHLOROFLUOROMETHANE	ND	0.001	UG/L	03/27/92	NO
XYLENE	ND	0.001	UG/L	03/27/92	NO
ACETONE	ND	10	UG/L	03/27/92	NO
ETHYL ACETATE	ND	10	UG/L	03/27/92	NO
ETHYL BENZENE	ND	0.001	UG/L	03/27/92	NO
ETHYL ETHER	ND	0.001	UG/L	03/27/92	NO
METHYL ISOBUTYL KETONE	ND	0.001	UG/L	03/27/92	NO
n-BUTYL ALCOHOL	ND	10	UG/L	03/27/92	NO

Test Description	Result	Limit	Units	Analyzed	By
CYCLOHEXANONE	ND	0.001	UG/L	03/27/92	NO
METHANOL	ND	10	UG/L	03/27/92	NO
TOLUENE	ND	0.001	UG/L	03/27/92	NO
ISOBUTANOL	ND	10	UG/L	03/27/92	NO
Surrogates					
4-BROMOFLUOROBENZENE		Min:	Max:		
1,2-DICHLOROETHANE-d4		Min:	Max:		
TOLUENE-d8		Min:	Max:		
TCLP METALS					
ARSENIC	<0.005	0.005	MG/L		JB
BARIUM	<0.5	0.5	MG/L		JB
CADMIUM	0.004	0.003	MG/L		JB
CHROMIUM	<0.02	0.02	MG/L		JB
LEAD	<0.10	0.10	MG/L		JB
MERCURY	<0.0002	0.0002	MG/L		JB
SELENIUM	<0.005	0.005	MG/L		JB
SILVER	0.02	0.010	MG/L		JB
TCLP ORGANICS ENRON EXT	N/A		N/A		JC
TCLP ORGANICS ENRON LIST#2					
BENZENE	0.160	0.001	MG/L	03/20/92	JS
CARBON TETRACHLORIDE	ND	0.001	MG/L	03/20/92	JS
CHLOROBENZENE	ND	0.001	MG/L	03/20/92	JS
PYRIDINE	ND	0.02	MG/L	03/20/92	JS
1,2-DICHLOROETHANE	ND	0.001	MG/L	03/20/92	JS
1,1-DICHLOROETHYLENE	ND	0.001	MG/L	03/20/92	JS
METHYL ETHYL KETONE	ND	0.001	MG/L	03/20/92	JS
TETRACHLOROETHYLENE	ND	0.001	MG/L	03/20/92	JS
TRICHLOROETHYLENE	0.001	0.001	MG/L	03/20/92	JS

ASSAIGAI
ANALYTICAL LABORATORIES, INC. • 7300 Jefferson, N.E. • Albuquerque, New Mexico 87109 3711 Admiral, Suite C • El Paso, Texas 79925

Test Description	Result	Limit	Units	Analyzed	By
VINYL CHLORIDE	ND	0.001	MG/L	03/20/92	JS
O-CRESOL	ND	0.02	MG/L	03/20/92	JS
M-CRESOL	ND	0.02	MG/L	03/20/92	JS
P-CRESOL	ND	0.02	MG/L	03/20/92	JS
1,4-DICHLOROBENZENE	ND	0.02	MG/L	03/20/92	JS
2,4,5-TRICHLOROPHENOL	ND	0.02	MG/L	03/20/92	JS
HEXACHLOROBENZENE	ND	0.02	MG/L	03/20/92	JS
HEXACHLORO-1,3-BUTADIENE	ND	0.02	MG/L	03/20/92	JS
HEXACHLOROETHANE	ND	0.02	MG/L	03/20/92	JS
2,4,6-TRICHLOROPHENOL	ND	0.02	MG/L	03/20/92	JS
PENTACHLOROPHENOL	ND	0.02	MG/L	03/20/92	JS
Surrogates					
NITROBENZENE-d5	63	Min: 35	Max: 114		
2-FLUOROBIPHENYL	54	Min: 43	Max: 116		
TERPHENYL-d14	77	Min: 33	Max: 141		
PHENOL-d5	35	Min: 10	Max: 94		
2-FLUOROPHENOL	53	Min: 10	Max: 123		
TCLP ZERO HEAD EXTRACTION	N/A		N/A		JC
TOTAL DIGESTION (EXT.)	N/A		N/A		DS

APPENDIX E

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3711 Admiral, Suite C • El Paso, Texas 79925

REGULAR TEST RESULTS BY TEST

BICARBONATE Minimum: 2.0 Maximum: 100
Method: EPA 310.1

Sample	Sample Description	Result	Units	Extracted	Analyzed	By
01A	EUNICE PORTABLE H2O 3-021	240	MG/L		03/24/92	RF

CALCIUM (TOTAL) Minimum: 0.1 Maximum: 100
Method: EPA 215.1

Sample	Sample Description	Result	Units	Extracted	Analyzed	By
01B	EUNICE PORTABLE H2O 3-022	54.22	MG/L	03/13/92	03/19/92	JB

CARBONATE Minimum: 2.0 Maximum: 100
Method: EPA 310.1

Sample	Sample Description	Result	Units	Extracted	Analyzed	By
01A	EUNICE PORTABLE H2O 3-021	<2.0	MG/L		03/24/92	RF

CHLORIDE Minimum: 1.0 Maximum: 100
Method: EPA 325.3

Sample	Sample Description	Result	Units	Extracted	Analyzed	By
01A	EUNICE PORTABLE H2O 3-021	95	MG/L		03/13/92	RF

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MAGNESIUM (TOTAL) **Minimum: 0.005** **Maximum: 20**
Method: EPA 242.1

Sample	Sample Description	Result	Units	Extracted	Analyzed	By
01B	EUNICE PORTABLE H2O 3-022	32.3	MG/L	03/13/92	03/19/92	JB

PH ON WATERS **Minimum: 1.0** **Maximum: 14**
Method: EPA 150.1

Sample	Sample Description	Result	Units	Extracted	Analyzed	By
01A	EUNICE PORTABLE H2O 3-021	7.58 pH	UNITS		03/13/92	RF

POTASSIUM (TOTAL) **Minimum: 0.05** **Maximum: 20**
Method: EPA 258.1

Sample	Sample Description	Result	Units	Extracted	Analyzed	By
01B	EUNICE PORTABLE H2O 3-022	5.90	MG/L	03/13/92	03/19/92	JB

SODIUM (TOTAL) **Minimum: 0.02** **Maximum: 20**
Method: EPA 273.1

Sample	Sample Description	Result	Units	Extracted	Analyzed	By
01B	EUNICE PORTABLE H2O 3-022	138	MG/L	03/13/92	03/19/92	JB

TOTAL DIGESTION (EXT.) **Minimum:** **Maximum:**
Method: EPA 413.1

Sample	Sample Description	Result	Units	Extracted	Analyzed	By
01B	EUNICE PORTABLE H2O 3-022	N/A	N/A	03/13/92		DS

TOTAL DISSOLVED SOLID **Minimum:** **1.0** **Maximum:** **100**
Method: EPA 160.1

Sample	Sample Description	Result	Units	Extracted	Analyzed	By
01A	EUNICE PORTABLE H2O 3-021	720	MG/L		03/17/92	RF