

GW - 139

**PERMITS,
RENEWALS,
& MODS
Application**

Chavez, Carl J, EMNRD

From: Chavez, Carl J, EMNRD
Sent: Tuesday, January 22, 2008 4:53 PM
To: 'Klein, Elisabeth A'
Cc: Price, Wayne, EMNRD
Subject: FW: DCP Midstream, LP Status of Discharge Plans (Active, Inactive & Closed) & Other Miscellaneous Discharge Plans
Attachments: GW-150 DP.tif

Elisabeth:

Re: DCP Midstream LP Letter of January 31, 2007 Renewal of Expired Discharge Plans as Requested by Carl Chavez & Other DPs currently being processed

Hi. Please find below the status of the DPs, etc. that were included in the above referenced letter.

1) Pure Gold "28" CS (GW-150): The permit expired on 11/22/2003 and is still active. Our records reflect a draft permit was issued to ConocoPhillips (COP) on January 23, 2004, but the final permit was never signed and returned to OCD with the \$1,700 flat fee. Please find attached a copy of the permit (COP), please sign and return the final permit with the \$1,700 to OCD. We apologize for the changes; however, considering the situation, it is the most expedient means of resolving the discharge plan for the facility.

2) Rambo C.S. (formerly Avalon Gas Plant) (GW-24): The permit expired on 9/18/2005 and is listed as inactive. According to your letter the OCD received the pit closure reports and analytical results required by the OCD's April 7, 2004 approval letter and were provided in your letter. The OCD requests to know the status of operations at the facility? Does DCP Midstream, LP wish to close the facility? If so, the OCD needs a closure plan. The OCD requires inactive facilities to submit a closure plan, unless it plans to continue operations, which will require a discharge plan renewal.

3) Apex C.S. (GW-163): Currently in litigation.

4) Hobbs Gas Plant (GW-175) currently in litigation.

5) Eunice Gas Plant (GW-16): According to OCD records GW-009 and GW-016 were merged into GW-16. The permit expires 4/25/2009 and is active. No action needed at this time.

6) CP-1 C.S. (GW-139): The permit was closed.

7) Indian Hills Gas Plant (GW-42): OCD records indicate that the facility is inactive. The OCD requests the status of the facility and if it is inactive, we request a closure plan. The OCD will be conducting an inspection of this facility.

Discharge Plan Renewals processed tomorrow are:

1) Hobbs Booster Station (GW -44): OCD records indicate that the facility is active with an expiration date of 12/27/2007. A \$100 filing fee was received and determined to be administratively complete and OCD will issue public notice, a draft discharge plan, and administratively complete letter on its website tomorrow. The facility is closed and only remediation activities are ongoing at present.

2) Magnum C.S. (GW-127): OCD records indicate that the facility is active with an expiration date of 2/3/2008. A \$100 filing fee was received and determined to be administratively complete and OCD will issue public notice, a draft discharge plan, and administratively complete letter on its website tomorrow.

3) Carrasco C.S. (GW-137): OCD records indicate that the facility is active with an expiration date of 4/28/2008.

1/23/2008

A \$100 filing fee was received and determined to be administratively complete and OCD will issue public notice, a draft discharge plan, and administratively complete letter on its website tomorrow.

4) Pardue C.S. (GW-288): OCD records indicate that the facility is active with an expiration date of 11/24/2007. A \$100 filing fee was received and determined to be administratively complete and OCD will issue public notice, a draft discharge plan, and administratively complete letter on its website tomorrow. DCP Midstream, LP is in the process of completing a closure plan and will submit it prior to completion of closure.

DCP Midstream, LP Discharge Plans awaiting final signature of discharge plan with \$1,700 final fee:

1) Northeast Carlsbad C.S. (GW-280)

Miscellaneous Discharge Plans:

1) Lee C.S. (GW-227): The permit expired on 12/28/2005 and is listed as inactive. Also, our records show LG&E Hadson Gillespie/Feagan C.S. for the facility name. According to an OCD e-mail msg. dated 12/21/2006, and DPC correspondence dated 12/28/2006, the facility was going to remain inactive and a closure plan was to be submitted to permanently close the facility. Upon receipt of the closure plan info. and verification that no contamination exists at the facility, and some photos to display what the site currently looks like, the OCD was going to consider closure of the facility. The OCD requests to know the status of operations at the facility?

Please provide me with an update on each of the above items and contact me if you have questions. Thank you.

Carl J. Chavez, CHMM
 New Mexico Energy, Minerals & Natural Resources Dept.
 Oil Conservation Division, Environmental Bureau
 1220 South St. Francis Dr., Santa Fe, New Mexico 87505
 Office: (505) 476-3491
 Fax: (505) 476-3462
 E-mail: CarlJ.Chavez@state.nm.us
 Website: <http://www.emnrd.state.nm.us/ocd/index.htm>
 (Pollution Prevention Guidance is under "Publications")

From: Chavez, Carl J, EMNRD
Sent: Thursday, January 17, 2008 2:27 PM
To: 'Klein, Elisabeth A'
Subject: Northeast Carlsbad Compressor Station (GW-280) Signed Discharge Plan w/ \$1,700.00 Renewal Fee

Ms. Klein:

Good afternoon. I am now working on DCP Midstream L.P. applications, etc.

NMOCD records show that we never received the final signed DP for GW-280 (NE Carlsbad C.S.) with the \$1,700.00 renewal fee. NMOCD mailed a letter with the attached final discharge plan for DCP Midstream L.P.'s signature and remittance w/ final payment; however, we did not receive it. Please locate the final discharge plan that was dated June 13, 2007, sign it, and remit it to me with the final \$1,700.00 renewal fee so we may update our records and finalize the permit at this facility.

I have been in receipt of DCP Midstream L.P. Discharge Plans (GWs-24, 44, 127, 137, 150, and 288). I am planning to process them by next Wednesday, January 23, 2008. I will let you know if I need anything based on my review.

Please contact me if you have questions. Thank you.

Carl J. Chavez, CHMM
 New Mexico Energy, Minerals & Natural Resources Dept.

1/23/2008

Oil Conservation Division, Environmental Bureau
1220 South St. Francis Dr., Santa Fe, New Mexico 87505
Office: (505) 476-3491
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E-mail: CarlJ.Chavez@state.nm.us
Website: <http://www.emnrd.state.nm.us/ocd/index.htm>
(Pollution Prevention Guidance is under "Publications")



GW-139 CP-1

CLOSED - NO ACTION

ATTACHMENT 4



NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON

Governor

Joanna Prukop
Cabinet Secretary

October 15, 2003

Lori Wrotenbery

Director

Oil Conservation Division

Mr. Stephen Weathers
Duke Energy Field Services
P.O. Box 5493
Denver, Colorado 80217

**RE: Closure Approval
CP-1 Compressor Station GW-139
Duke Energy Field Services**

Dear Mr. Weathers:

The New Mexico Oil Conservation Division (OCD) received the Soil Assessment and Closure Report for the CP-1 Compressor Station located in the NE/4 SE/4 of Section 15, Township 23 South, Range 28 East, NMPM, Eddy County, New Mexico. The closure report, dated October 2, 2003, was submitted by your consultant, BNC Environmental Services, Inc. on behalf of Duke Energy Field Services. **Based upon the information provided in the Soil Assessment and Closure Report the site is hereby approved for closure.**

This OCD decision does not relieve Duke Energy Field Services of liability should operation of the pipeline result in contamination of surface waters, ground waters or the environment. In addition, OCD approval does not relieve Duke Energy Field Services of responsibility for compliance with any other federal, state or local laws and regulations.

If you have any questions regarding this matter feel free to call me at (505)-476-3489.

Sincerely,

W. Jack Ford, C.P.G.
Environmental Engineer
Environmental Bureau, OCD

cc: OCD Artesia District Office



Duke Energy Field Services
P.O. Box 5493
Denver, Colorado 80217
370 17th Street, Suite 900
Denver, Colorado 80202
303/595-3331

January 7, 2003

FEDERAL EXPRESS
Express Saver (Tracking Number 8336 1954 7662)

Mr. Jack Ford
New Mexico Energy, Minerals
& Natural Resources Department
Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

Subject: CP-1 Compressor Station
Discharge Plan GW-139
Eddy County, New Mexico

Dear Mr. Ford:

Duke Energy Field Services, LP (DEFS) has dismantled the CP-1 Compressor Station and currently only a meter run is located on that site. There are no discharges from the facility that may move directly or indirectly into groundwater. Therefore, DEFS does not intend to renew the discharge plan for this facility..

If you have any questions concerning this correspondence, please contact me at (303) 605-1717. Please send all correspondence regarding this discharge plan to me at 370 17th Street, Suite 900, Denver, CO 80202.

Sincerely,
Duke Energy Field Services, LP

Karin Char Kimura
Senior Environmental Specialist

cc: NMOCD District 2 Office (via FedEx Express Saver Tracking No. 8336 1954 7673)
1301 W. Grand Ave.
Artesia, New Mexico 88210

bcc: Greg Kardos
Ruth Lang (~~w/o attachments~~)
Jennifer Fuqua (~~w/o attachments~~)
Johnny Lamb (Facility Env. File: 2.2.3.1 CP-1 Booster Station)
Lynn Ward (Reg. Env. File 2.2.3.1 CP-1 Booster Station)
Corp. Env. File 2.2.3.1 CP-1 Booster Station, NM

ATTACHMENT TO THE DISCHARGE PLAN GW-139 RENEWAL
UNION PACIFIC RESOURCES COMPANY
CP-1 COMPRESSOR STATION
DISCHARGE PLAN APPROVAL CONDITIONS
(March 2, 1998)

1. **Union Commitments:** Union will abide by all commitments submitted in the discharge plan application dated February 2, 1998.
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.
4. **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.
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 Artesia 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:** Union, by the officer whose signature appears below, accepts this permit and agrees to comply with all terms and conditions contained herein. Union 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: *Karen Sengletary*

UNION PACIFIC RESOURCES COMPANY

by *Environmental Specialist*
Title