GW - 212

GENERAL CORRESPONDENCE

YEAR(S):

2006 - 1995

Enterprise Products

P.O. Box 4324 Houston, Texas 77210-4324 713.880.6500
2727 North Loop West Houston, Texas 77008-1044 www.epplp.com

April 26, 2006

Mr. Wayne Price
Environmental Bureau Chief
New Mexico Oil Conservation Division
1220 South St. Francis Drive
Santa Fe, NM 87505

2006 MAY 4 AM 11 47

Subject: **Discharge Permit GT-185 Kutz #2 Compressor Station**
Discharge Permit SW-211 Largo Compressor Station
Discharge Permit GW-212 Ballard Compressor Station
Discharge Permit GW-209 Lindrith Compressor Station
Discharge Permit GW-188 3B-1 Compressor Station
Discharge Permit GW-189 Angel Peak Compressor Station

Dear Mr. Price:

As requested in your letter dated April 12, 2006, enclosed are signed copies of the attachment to the Discharge Permit for each of the above locations. Also enclosed is Enterprise's check in the amount of $10,200 ($1700 per location) in payment of fees associated with the discharge plans.

As you will note, the Attachment to the Discharge Permit has been signed on behalf of Enterprise by our Vice President and General Manager of Operations, Mr. Terry L. Hurlburt.

Should you have questions or need additional information, please contact Mr. Doug Jordan, Environmental Manager – Midstream Systems at 713-880-6629.

Yours truly,

Shiver J. Nolan
Senior Compliance Administrator

enclosures
attachments for each location
check

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 5/25/06

or cash received on _____ in the amount of $ 17000 00

from Enterprise Products

for GW-212 Ballards Compressor station

Submitted by: Lawrence Romero Date: 5/30/06

Submitted to ASD by: Lawrence Romero Date: 5/30/06

Received in ASD by: _____ Date: _____

Filing Fee _____ New Facility _____ Renewal _____

Modification _____ Other _____

Organization Code 521.07 Applicable FY 2004

To be deposited in the Water Quality Management Fund.

Full Payment ✓ or Annual Increment _____

THE FACE OF THIS DOCUMENT CONTAINS SECURITY PRINTING.

ENTERPRISE PRODUCTS OPERATING L.P.
P.O.BOX 4324
HOUSTON, TEXAS 77210

ENTERPRISE

BANK ONE, NA

56-1544/441

[redacted]

DATE

25-APR-06

PAY EXACTLY

AMOUNT

Ten Thousand Two Hundred And No/100 Dollars

$******10,200.00

PAY TO THE ORDER OF

STATE OF NEW MEXICO
1220 SOUTH SAINT FRANCIS DR
SANTA FE, NM 87505
United States

REGULAR ACCOUNT
VOID AFTER 180 DAYS

W. Randolph Fosley

[redacted]

THE SANTA FE
NEW MEXICAN
Founded 1849

2006 MAR 10 PM 2 01
NM EMNRD OIL CONSERVATION
ATTN: Ed Martin
1220 S ST FRANCIS DR
SANTA FE NM 87505

ALTERNATE ACCOUNT: 56689
AD NUMBER: 00158987 ACCOUNT: 00002212
LEGAL NO: 78541 P.O. #: 06-199-050-125

588 LINES 1 TIME(S)	329.28
AFFIDAVIT:	6.00
TAX:	25.57
TOTAL:	360.85

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO
COUNTY OF SANTA FE

I, R, Lara, 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 # 78541 a copy of which is hereto attached was published in said newspaper 1 day(s) between 03/07/2006 and 03/07/2006 and that the notice was published in the newspaper proper and not in any supplement; the first date of publication being on the 7th day of March, 2006 and that the undersigned has personal knowledge of the matter and things set forth in this affidavit.

/S/ R, Lara
LEGAL ADVERTISEMENT REPRESENTATIVE

Subscribed and sworn to before me on this 7th day of March, 2006

OK To Pay
Ed Martin
3-20-06

Notary Laura E. Harding

Commission Expires: 11/23/07

OFFICIAL SEAL
Laura E. Harding
NOTARY PUBLIC
STATE OF NEW MEXICO
My Commission Expires: 11/23/07

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 permit application has been submitted to the Director of the Oil Conservation Division, 1220 S. St. Francis, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

(GW-188) Enterprise Products Operating, L.P., Mr. Terry L. Hurlburt, Vice President & General Manager of Operations, P.O. Box 4324, Houston, TX 77210-4324, has submitted a renewal application for the previously approved discharge permit for their 3B-1 Compressor Site, located in the NW/4 SW/4 of Section 33, Township 30 North, Range 9 West, NMPM, San Juan County, New Mexico. The total discharge will be about 15 gallons/day. This fluid will consist of oil and water and will be discharged to closed top storage tanks on site. Hydrocarbons will be separated from the water and recycled. The wastewater will then be disposed of by evaporation at an OCD-approved facility. 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 total dissolved solids concentration of approximately 1,500 mg/l. The discharge permit addresses how spills, leaks and other accidental discharges to the surface will be managed.

(GW-212) Enterprise Products Operating, L.P., Mr. Terry L. Hurlburt, Vice President & General Manager of Operations, P.O. Box 4324, Houston, TX 77210-4324, has submitted a renewal application for the previously approved discharge permit for their Ballard Compressor Station, located in the SE/4 NE/4 of Section 26, Township 26 North, Range 9 West, NMPM, San Juan County, New Mexico. Approximately 2 gallons per day of process wastewater with total dissolved solids concentration of approximately 3,500 mg/L is stored in an above grade, closed-top steel tank prior to offsite disposal at an OCD-approved facility. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 440 feet with total dissolved solids concentration of approximately 820 mg/L. The discharge permit addresses how spills, leaks and other accidental discharges to the surface will be managed.

(GW-211) Enterprise Products Operating, L.P., Mr. Terry L. Hurlburt, Vice President & General Manager of Operations, P.O. Box 4324, Houston, TX 77210-4324, has submitted a renewal application for the previously approved discharge permit for their Largo Compressor Station, located in the SW/4 NW/4 of Section 15, Township 26 North, Range 7 West, NMPM, Rio Arriba County, New Mexico. Approximately 115 gallons per day of process wastewater with total dissolved solids concentration of 3,500 mg/L is stored in an above grade, closed-top steel tank prior to offsite disposal at an OCD-approved facility. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 255 feet with total dissolved solids concentration of approximately 542 mg/L. The discharge permit addresses how spills, leaks and other accidental discharges to the surface will be managed.

(GW-209) Enterprise Products Operating, L.P., Mr. Terry L. Hurlburt, Vice President & General Manager of Operations, P.O. Box 4324, Houston, TX 77210-4324, has submitted a renewal application for the previously approved discharge permit for their Lindrith Compressor Station, located in the NE/4 SE/4 of Section 18, Township 24 North, Range 5 West, NMPM, Rio Arriba County, New Mexico. Approximately 86 gallons per day of process wastewater with total dissolved solids concentration of 3,500 mg/L is stored in a below-grade, closed-top steel tank with positive leak detection prior to offsite disposal at an OCD-approved facility. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 750 feet with total dissolved solids concentration of approximately 760 mg/L. The discharge permit addresses how spills, leaks and other accidental discharges to the surface will be managed.

(GW-189) Enterprise Products Operating, L.P., Mr. Terry L. Hurlburt, Vice President, P.O. Box 4324, Houston, TX 77210-4324, has submitted a renewal application for the previously approved discharge permit for their Angel Peak Compressor Station, located in the NE/4 NE/4 of Section 8, Township 27 North, Range 10 West, NMPM, San Juan County, New Mexico. The total discharge will be about 19 gallons/month. This fluid will consist of oil and water and will be discharged to closed top storage tanks on site. Hydrocarbons will be separated from the water and recycled. The wastewater will then be disposed of by evaporation at an OCD- approved facility. Groundwater most likely to be affected by a spill, leak or accidental discharge to the surface is at a depth of approximately 900 feet with total dissolved solids concentration of approximately 510 mg/l. The discharge permit addresses how spills, leaks and other accidental discharges to the surface will be managed.

(GW-186) Enterprise Products Operating, L.P., Mr. Terry L. Hurlburt, Vice President, P.O. Box 4324, Houston, TX 77210-4324, has submitted a renewal application for the previously approved discharge permit for their Kutz 2 Compressor Station, located in the SE/4 SW/4 of Section 15, Township 29 North, Range 12 West, NMPM, San Juan County, New Mexico. Approximately 12 gallons per day of wastewater with total dissolved solids concentration of approximately 1,000 mg/l is stored in an above ground closed top steel tank prior to offsite disposal at an OCD approved disposal facility. Groundwater most likely to be affected in the event of an accidental discharge is at a depth ranging from 317 feet to 810 feet with total dissolved solids concentration of approximately 2,000 mg/l. The discharge permit 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 permit application may be viewed at the above address between 8:00 a.m. and 4:00 p.m., Monday through Friday. The draft permit conditions for operation are available on the OCD website www.emnrd.state.nm.us/emnrd/ocd/. Prior to ruling on any proposed discharge permit 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 permit based on information available. If a public hearing is held, the director will approve or disapprove the proposed permit based on information in the application and information submitted at the hearing.

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 1ST day of March 2006.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

MARK E. FESMIRE,
P.E., Director

Legal#78541
Pub. Mar. 7, 2006

AFFIDAVIT OF PUBLICATION

Ad No. 53085

STATE OF NEW MEXICO
County of San Juan:

CONNIE PRUITT, being duly sworn says: That she is the ADVERTISING MANAGER of THE DAILY TIMES, a daily newspaper of general circulation published in English at Farmington, said county and state, and that the hereto attached Legal Notice was published in a regular and entire issue of the said 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 publication and appeared in the Internet at The Daily Times web site on the following day(s):

Tuesday, March 07, 2006.

And the cost of the publication is $194.35.

Connie Pruitt

ON 3/7/06 CONNIE PRUITT appeared before me, whom I know personally to be the person who signed the above document.

Wynell Corey

My Commission Expires November 17, 2008

COPY OF PUBLICATION

918 Legals

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 permit application has been submitted to the Director of the Oil Conservation Division, 1220 S. St. Francis, Santa Fe, New Mexico 87505, Telephone (505) 476-3440:

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 1ST day of March 2006.

STATE OF NEW MEXICO

OIL CONSERVATION DIVISION

SEAL

MARK E. FESMIRE, P.E., Director

Legal No. 53085 published in The Daily Times, Farmington, New Mexico on Tuesday, March 7, 2006.

NOTICE OF PUBLICATION

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

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GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 1ST day of March 2006.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

S E A L

MARK E. FESMIRE, P.E., Director

Enterprise Products

P.O. Box 4324 Houston, Texas 77210-4324 713.880.6500
2727 North Loop West Houston, Texas 77008-1044 www.epplp.com

February 15, 2006

7005 1820 0006 5546 1192
Return Receipt Requested

Mr. Ed Martin
Environmental Engineer
New Mexico Natural Resources Department
1220 South Saint Francis Drive
Santa Fe, New Mexico 87505

RE: Discharge Plan Renewal Applications
GW - 188 3B-1 Compressor Station
212 Ballard Compressor Station
211 Largo Compressor Station
209 Lindrith Compressor Station
189 Angel Peak Compressor Station
AND Kutz #2 GW-186

Enterprise Products Operating L.P., as operator for Enterprise Field Services LLC, herein submits the discharge plan renewal applications and discharge plans for the subject facilities. These facilities were acquired by Enterprise from GulfTerra Energy Partners as a part of an acquisition from El Paso Field Services. Also enclosed is Enterprise's check in the amount of $600 in payment of fees associated with the renewals.

Should you have questions or need additional information, please contact Mr. Doug Jordan, Environmental Manager, at 713-880-6629.

Yours truly,

Shiver J. Nolan
Senior Compliance Administrator

/sjn
enclosures

Martin, Ed, EMNRD

To: DJordan@eprod.com

Subject: RE: Enterprise Products OCD Discharge Plans

OK. Thanks for the response.

Ed Martin
New Mexico Oil Conservation Division
Environmental Bureau
1220 S. St. Francis
Santa Fe, NM 87505
Phone: 505-476-3492
Fax: 505-476-3462
email: ed.martin@state.nm.us

From: DJordan@eprod.com [mailto:DJordan@eprod.com]
Sent: Friday, January 20, 2006 11:55 AM
To: Martin, Ed, EMNRD
Subject: RE: Enterprise Products OCD Discharge Plans

Ed, I didn't even catch the 2005-2006 and just read 2006 into the letter. Guess I knew what you meant to "say".

We had sent the plans to our Field Operations to confirm that the data in the underlying applications/permit was/is still valid and correct. Minor changes have been noted and we have revised the applications accordingly. The applications made it to Houston and we realized that we needed to revise the plans to reflect the proper Enterprise Field Services, LP and Enterprise Products Operating L.P designation and we are making those changes. In the process of making those changes, we realized that our "new" VP of Operations (Terry Hurlburt has been VP of Operations for Enterprise for several years, but the former El Paso assets are new to his domain) has not seen the full applications or contents of our "See On File" comment. As such, we are pulling that information together for his perusal. Although it doesn't change our submittal, I believe it to be a prudent action to allow the signing party to see what we are representing.

With that, we should have the applications sent your way next week.

We are also working on the plan renewals for the facilities that you reminded us are close to their expiration date.

> -----Original Message-----
> **From:** Martin, Ed, EMNRD [mailto:ed.martin@state.nm.us]
> **Sent:** Thursday, January 19, 2006 8:41 AM
> **To:** Jordan, Doug M.
> **Subject:** RE: Enterprise Products OCD Discharge Plans
>
> I have a couple of letters to Terry Hurlburt concerning discharge plans with certain due dates for renewals:
>
> Letter dated December 20, 2005 concerning GW-189 on the Angel Peak Compressor Station. Due date for submission of renewal application is January 20, 2006.
> Letter dated December 21, 2005 concerning GW's-209, 211, 212 on Lindrith, Largo, and Ballard compressor stations. Due date for submission of renewal application is January 23, 2006.
>
> Well, really the letters say due dates are January 20 and 23 of 2005. Sorry about that. Anyway, did you get these and how are they coming?

Martin, Ed, EMNRD

To: DJordan@eprod.com

Subject: RE: Enterprise Products OCD Discharge Plans

I have a couple of letters to Terry Hurlburt concerning discharge plans with certain due dates for renewals:

Letter dated December 20, 2005 concerning GW-189 on the Angel Peak Compressor Station. Due date for submission of renewal application is January 20, 2006.
Letter dated December 21, 2005 concerning GW's-209, 211, 212 on Lindrith, Largo, and Ballard compressor stations. Due date for submission of renewal application is January 23, 2006.

Well, really the letters say due dates are January 20 and 23 of 2005. Sorry about that. Anyway, did you get these and how are they coming?

Ed Martin
New Mexico Oil Conservation Division
Environmental Bureau
1220 S. St. Francis
Santa Fe, NM 87505
Phone: 505-476-3492
Fax: 505-476-3462
email: ed.martin@state.nm.us

From: DJordan@eprod.com [mailto:DJordan@eprod.com]
Sent: Wednesday, January 04, 2006 3:23 PM
To: Martin, Ed, EMNRD
Subject: Enterprise Products OCD Discharge Plans

Mr. Martin, I received copies of the letters you sent to Terry Hurlburt regarding the expired Discharge Plans and the plans that are approaching the expiration date. I do appreciate the reminder and have asked my staff to prioritize the plan renewals.

I did note that Lincoln B Compressor Station was included on the list of facilities with a soon to expire plan. The Lincoln B Compressor Station is an El Paso Natural Gas facility and not an Enterprise Products facility.

We also decommissioned one of the Angel Peak Compressor Stations. I believe that it is the one referenced in your letter indicating expiration last June. Upon confirmation that it is the facility we decommissioned, I will send you a confirmation email.

Thanks again for the reminder.

Douglas Jordan
Environmental Manager, Enterprise Products Midstream Systems
713-880-6629

NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

BILL RICHARDSON
Governor
Joanna Prukop
Cabinet Secretary

Mark E. Fesmire, P.E.
Director
Oil Conservation Division

December 21, 2005

CERTIFIED MAIL
RETURN RECEIPT 7001-1940-0004-7920-7782

Mr. Terry Hurlburt
Enterprise Products Operating, L.P.
2727 North Loop West
Houston, TX 77008

RE: Expired Discharge Permits

Dear Mr. Hurlburt:

The following discharge permits, issued for the operation of the Enterprise Products Operating, L.P. (Enterprise) facilities shown have expired as follows:

GW-209	Lindrith Compressor Station	Expired August 24, 2005
GW-211	Largo Compressor Station	Expired August 24, 2005
GW-212	Ballard Compressor Station	Expired August 24, 2005

Enterprise must submit discharge permit renewals, to the Santa Fe Office, for these facilities by January 23, 2005.

If you have any questions, contact me at (505) 476-3492 or ed.martin@state.nm.us

NEW MEXICO OIL CONSERVATION DIVISION

Ed Martin

Edwin E. Martin
Environmental Bureau

Copy: Aztec District Office

Enterprise Products Operating, LP
614 Reilly Avenue
Farmington, NM 87401

Mr. Roger Anderson
New Mexico Oil Conservation Division
1220 S. St. Francis
Santa Fe, NM 87505

RE: Change of Ownership

Dear Roger:

This is to notify you of the change of ownership for the El Paso Field Services Co. facilities in the San Juan Basin area, in and near Farmington, NM. A list of the effected facilities, along with the Discharge Permit numbers, is attached. These plants and compressor stations are now owned by GulfTerra Energy Partners. L.P. ("GulfTerra"). GulfTerra is no longer affiliated with El Paso Corp.. It is now a subsidiary of Enterprise Products Partners, L.P. ("Enterprise"). All the GulfTerra facilities are operated by Enterprise Products Operating, L.P.

All local contact information as listed in the Discharge Plans is still current. However, Mr. E. Randal West is no longer the Responsible Party for the facilities. The new Legally Responsible Party for all the GulfTerra/Enterprise locations is:

Mr. Terry Hurlburt
Vice President
Enterprise Products Operating, L.P.
2727 North Loop West
Houston, TX 77008.

If you need any additional information regarding the change of ownership, please call me at (505) 599-2256.

Sincerely yours,

David Bays

David Bays, REM
Principal Environmental Scientist

Cc: Mr. Denny Foust – NMOCD – Aztec, NM

New Mexico Discharge Permit Numbers

Permit Number	Facility Name
GW-189	Angel Peak Plant
GW-212	Ballard Plant
GW-049	Blanco Plant
GW-71	Chaco Plant
GW-186	Kutz Plant
GW-049-1	Kutz Separator
GW-188-1	Hart Canyon #1 Station
GW0188-2	Hart Canyon #2 Station
GW-188-3	Hart Canyon #3 Station
GW-211	Largo Plant
GW-209	Lindrith Plant
GW-301	Manzanares Station
GW-298	Martinez Canyon Station
GW-303	Navajo City Station
GW-302	Potter Canyon Station
Gw-317	Rattlesnake Plant
GW-304	Turley Station
GW-153	2B-3A Station
GW-154	2B-3B Station
GW-188	3B-1 Station

EARTHJUSTICE
LEGAL DEFENSE FUND

Earthjustice Environmental Law Clinic
at the University of Denver

EPNG { ALTON JAMES, RICKY CROSBY, SANDRA MILLER

January 6, 2003

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Gregg A. Cooke, Administrator
Environmental Protection Agency, Region VI
1445 Ross Avenue, Suite 1200
Dallas, TX 75202

By Fax: (214) 665-6648

Re: Citizen's Petition for Preliminary Site Assessment under Section 9605(d) of the Comprehensive Environmental, Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. §9601 et seq.

Dear Mr. Cooke:

On behalf of Ms. Tweeti Blancett, pursuant to 42 U.S.C. §9605(d) and 40 C.F.R. §300.420(b)(5) we hereby request that the Environmental Protection Agency (EPA) conduct preliminary assessments of four (4) locations in northern New Mexico to determine the hazards to public health and the environment associated with a threatened release of hazardous substances, pollutants, and contaminants.

Ms. Blancett's ranch is located near Aztec, New Mexico, and her family has lived in northern New Mexico for five generations. Recently, Ms. Blancett was presented with information about various locations in the area where hazardous substances and other contaminants were buried by former owners and operators of oil and gas production and refining facilities. Each of these locations is in the direct path of surface or groundwater drainage into the San Juan River basin. The threatened release of hazardous substances and other contaminants poses an imminent and substantial danger to human health and the environment. Because Ms. Blancett and her family are part of this community, their health and well being is also at risk.

The specific locations, the nature of activities which reportedly occurred at the sites, and the probable effects of a release are described below.

I. Sunland Yard, Hampton Arroyo, Aztec, New Mexico

Contact information:
Sean Renfro
Rocky Mountain Division Manager
Sunland Construction, Inc.
816 NE Aztec Boulevard
Aztec, NM 87410
(505) 334 4350

-Photograph attached as Exhibit A-

This site is located next to the Hampton Arroyo, which drains into the Animas River. It is near the McCoy Elementary School. The site was formerly owned by El Paso Natural Gas and was recently sold to Sunland Construction.

When El Paso was the owner and operator of the site, it was used as a shop for oil field service trucks. At that time, mercury was used in well meters. Field workers periodically recalibrated these meters by adding new mercury. Any mercury that was spilled in the field trucks during the recalibration process was rinsed out at the shop into a sump pit that drained directly into the Hampton Arroyo. This was done for many years. The sump pit was later cemented over without any reclamation.

The Hampton Arroyo flows year round and because this specific stretch of the Arroyo is close to the McCoy Elementary School, it is a favorite place for children to play in the water. Because mercury was routinely washed into the Arroyo here where children play, and because there is an old mercury-containing pit in the direct path of drainage into the Arroyo, this site clearly poses a potential health hazard to the local population.

II. Farmington Yard, Farmington, New Mexico

Contact information:
Richard Farley
Burlington Resources, Inc.
3401 E 30th Street
Farmington, NM 87402
(505) 326-9700

-Photograph attached as Exhibit B-

This is another yard which was formerly owned by El Paso Natural Gas. The site has since been sold to Burlington Resources. It is located on the Animas River which contributes to Farmington's water supply.

When El Paso owned the yard, oil distillants, lead paint, mercury, and asbestos were dumped there and remain to this day. The potential migration of these hazardous substances and other pollutants threatens to contaminate the water supply of Farmington, thus posing an imminent danger to its citizens.

III. Old Blanco Refinery, Bloomfield, New Mexico East US 64, 1 mile from US 64 and NM 44

-Photograph attached as Exhibit C-

The Blanco Refinery was formerly owned by El Paso Natural Gas. It is very close to the Bloomfield Irrigation Ditch – Bloomfield's water source. The Blanco Refinery was torn down by El Paso and the land was sold to Burlington Resources and was recently resold to Duke Energy.

While El Paso was operating the refinery, they took contaminants from the plant, put them in 55 gallon drums, dug a trench, put the barrels in the trench, poked holes in the barrels, and covered up the mess with soil.

The punctured barrels, located so near the irrigation ditch, pose an obvious threat to Bloomfield's water supply.

This site was added to the CERCLIS database on October 1, 1986, and was archived on December 1, 1988, with a status of no further remedial action planned (NFRAP). However, Ms. Blancett believes that the dumping occurred after the EPA's 1988 site inspection and the site should be reinvestigated.

IV. Ballard Plant, Kutz Wash, just off the San Juan River, on Highway 550 45 miles South of Bloomfield, NM

-Photograph attached as Exhibit D-

This plant was owned and operated by El Paso Natural Gas. While it is no longer operating, during its operating years, El Paso buried mercury-filled meters and barrels of oil field waste near the Kutz Wash which is part of the San Juan River watershed.

The existence of this buried waste threatens the water supply of the surrounding area.

Notification of State and local authorities

Ms. Blancett has discussed the existence of these sites with a number of elected representatives and government personnel in the State of New Mexico. She has also discussed the sites with Joel Dougherty an enforcement officer in the Hazardous Waste Division at the EPA, Region VI. A copy of this letter is being sent to Mr. Dougherty. This letter is also being copied to the appropriate individuals at the New Mexico

Environment Department as well as to the potentially responsible parties to the disposal. The company representatives were previously notified by Ms. Blancett, but she received no reply from them.

Because Ms. Blancett's family has been a part of the northern New Mexico community for many generations, she is deeply concerned about the environment and the health and safety of the people there.

Please do not hesitate to request any necessary follow-up information and please provide a written response to this Petition. In the event that a preliminary assessment is deemed inappropriate, under 42 U.S.C. §9605(d), 40 C.F.R. 300.420(b)(5)(iii), and the Administrative Procedures Act (APA) 5 U.S.C. §555(e), please notify me and provide the reason for such determination. Thank you for your time and attention to this matter.

Sincerely,

Jay Tutchton
Earthjustice

Attachments: Exhibits A - D

cc: Myron O. Knudson, P.E.
Division Director, Superfund Division
EPA, Region VI

Joel Dougherty
Compliance Assurance and Enforcement
Hazardous Waste Division
EPA, Region VI

Marcy Leavitt, Bureau Chief
Ground Water Quality Bureau
New Mexico Environment Department
Harold Runnels Building, Room N2250
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, NM 87502

James P. Bearzi, General Manager
Hazardous Waste Bureau
New Mexico Environment Department
Harold Runnels Building
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, NM 87502

James H. Davis, Ph.D., Bureau Chief
Surface Water Quality Bureau
New Mexico Environment Department
Harold Runnels Building, Room N2050
1190 St. Francis Drive, P.O. Box 26110
Santa Fe, NM 87502

Sean Renfro
Rocky Mountain Division Manager
Sunland Construction, Inc.
816 NE Aztec Boulevard
Aztec, NM 87410

Richard Farley
Burlington Resources
Box 4289
3401 E. 30th Street
Farmington, NM 87402

Bruce Myerson
El Paso Natural Gas Co.
614 Reilly
Farmington, NM 87410

Ms. Tweeti Blancett
103 West Aztec Boulevard
Aztec, NM 87410

Exhibit A

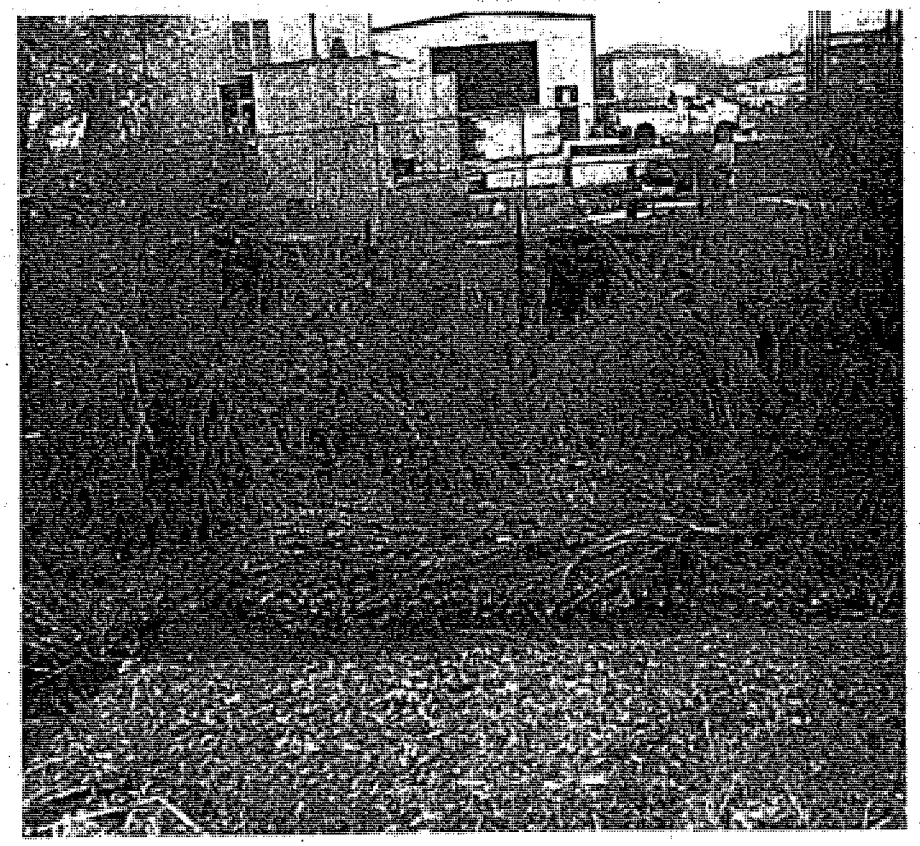

Exhibit B

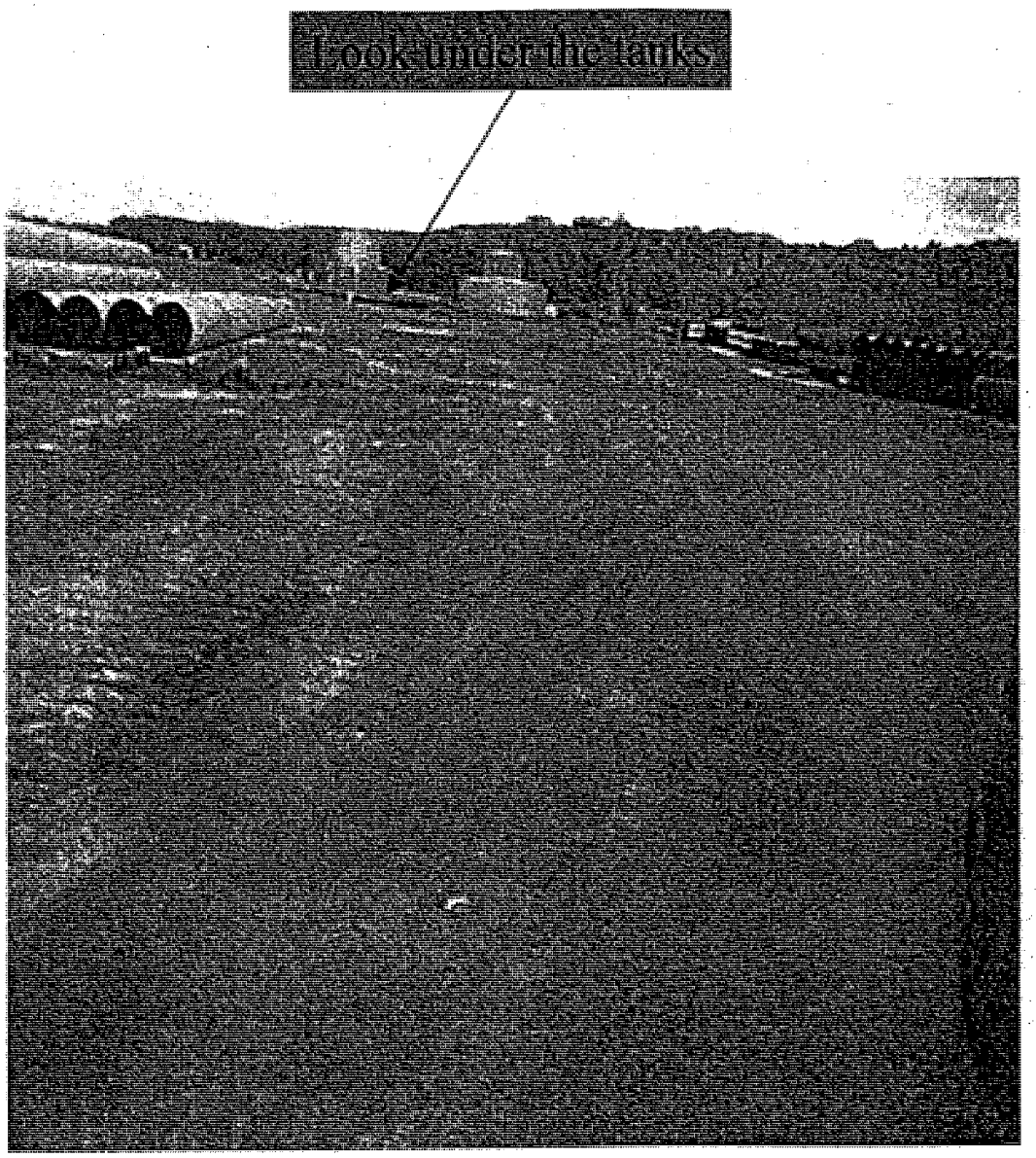

Exhibit C

Exhibit D

Martin, Ed

From: Martin, Ed
Sent: Thursday, March 01, 2001 10:49 AM
To: 'David Bays'
Subject: Discharge Plans and General Info.

Just a reminder that the following facilities' discharge plans will need to be renewed this year:

GW-232 Trunk A Compressor expired 2/5/2001
GW-071-1 Ballard Hydrocarbon Recovery Unit expires 5/9/2001
GW-049-1 Kutz Recovery Unit expires 6/17/2001
GW-242 Burton Flats South Compressor expires 8/9/2001
This is a 95 hp compressor in Eddy County operated or formerly operated by Compressor Systems, Inc.

GW-241 Burton Flats North Compressor expires 8/9/2001
This is an 810 hp compressor in Eddy County operated or formerly operated by Compressor Systems, Inc.

GW-247 Whiting Compressor Station expires 9/5/2001
GW-246 Axis #2 Compressor Station expires 9/5/2001
GW-265 Texaco Bilbrey expires 11/25/2001
This is a compressor station in Lea County. Last renewal for this facility was signed by Sandra Miller.

GW-267 Bass James Compressor Station expires 12/10/2001
This is a compressor station in Eddy County. Las renewal for this facility was signed by Sandra Miller.

Also, please send me documentation as to the operational changes that will be made to improve housekeeping at the following facilities:

GW-212 Ballard Compressor Station
GW-189 Angel Peak Compressor Station
GW-186 Kutz 2 Compressor Station
GW-188-1 Hart Canyon #1 Compressor Station
GW-188 3B-1 Compressor Station
GW-188-2 Hart Canyon #2 Compressor Station
GW-188-3 Hart Canyon #3 Compressor Station

EL PASO
FIELD SERVICES

NOV 16 2000

November 14, 2000

New Mexico Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505

Dear Sirs:

Please find enclosed checks for the Discharge Plan flat fess for the following El Paso Field Services Co. facilities:

Angel Peak Compressor Station - Discharge Plan GW-189 – check no. 01050045

Ballard Compressor Station – Discharge Plan GW-212 – check no. 01050043

Kutz Compressor Station - Discharge Plan GW-186 – check no. 01050044

If you need anything further related to the renewal of these three plans, please call me at (505) 599-2256.

Sincerely yours,

David Bays

David Bays, REM
Principal Environmental Scientist

El Paso Field Services Company 614 Reilly Avenue Farmington, New Mexico 87401 Phone (505) 325-2841 Fax (505) 599-2235

Check Date: 11/09/2000

EL PASO FIELD SERVICES COMPANY
Refer Payment Inquires to (713) 420-5719

Check No. 01050043

Invoice Number	Invoice Date	Voucher ID	Gross Amount	Discount Available	Paid Amount
BALLARD 11/00	11/06/2000	00091715	690.00	0.00	690.00
DISCHARGE PLAN FEES BALLARD					

GW-212

Vendor Number	Vendor Name			Total Discounts	
0000019137	WATER QUALITY MANAGEMENT FUND			$0.00	
Check Number	**Date**		**Total Amount**	**Discounts Taken**	**Total Paid Amount**
[redacted]	11/09/2000		$ 690.00	0.00	$690.00

ACKNOWLEDGEMENT OF RECEIPT OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 11/9/00,
or cash received on 11/16/00 in the amount of $ 690.00
from EL PASO FIELD SERVICES CO.
for BALLARD COMPRESSOR STA. (Facility Name) GW-212 (DP No.)
Submitted by: _____ Date: _____
Submitted to ASD by: ED MARTIN Date: 11/16/00
Received in ASD by: _____ Date: _____
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 ___

THE FACE OF THIS DOCUMENT HAS A BLUE BACKGROUND AND MICROPRINTING. THERE IS AN ARTIFICIAL WATERMARK ON THE REVERSE SIDE.

EL PASO FIELD SERVICES COMPANY
1001 Louisiana
Houston, TX 77002

CITIBANK
One Penn's Way
New Castle, DE 19720

62-20/311

[redacted]

Pay Amount $690.00***

Date 11/09/2000

Void After One Year

Pay ****SIX HUNDRED NINETY AND XX / 100 US DOLLAR****

To The Order Of WATER QUALITY MANAGEMENT FUND

C/O OIL CONSERVATION DIVISION
2040 SOUTH PACHECO
SANTA FE, NM 87505

H. Brent Austin
Authorized Signature

[redacted]

NEW MEXICO ENVIRONMENT DEPARTMENT
REVENUE TRANSMITTAL FORM

	Description	FUND	CES	DFA ORG	DFA ACCT	ED ORG	ED ACCT	AMOUNT	
1	CY Reimbursement Project _____ Tax ___	064	01						1
5	Gross Receipt Tax	064	01		2329	900000	2329134		2
3	Air Quality Title V	092	13	1300	1696	900000	4169134		3
4	PRP Prepayments	248	14	1400	9696	900000	4969014		4
2	Climax Chemical Co.	248	14	1400	9696	900000	4969015		5
6	Circle K Reimbursements	248	14	1400	9696	900000	4969248		6
7	Hazardous Waste Permits	339	27	2700	1696	900000	4169027		7
8	Hazardous Waste Annual Generator Fees	339	27	2700	1696	900000	4169339		8
10	Water Quality - Oil Conservation Division	341	29		2329	900000	2329029		10
11	Water Quality - GW Discharge Permit	341	29	2900	1696	900000	4169029	690.00	11
12	Air Quality Permits	631	31	2500	1696	900000	4169031		12
13	Payments under Protest	851	33		2919	900000	2919033		13
*14	Xerox Copies	662	34		2349	900000	2349001		*14
15	Ground Water Penalties	662	34		2349	900000	2349002		15
16	Witness Fees	662	34		2349	900000	2349003		16
17	Air Quality Penalties	662	34		2349	900000	2349004		17
18	OSHA Penalties	662	34		2349	900000	2349005		18
19	Prior Year Reimbursement	662	34		2349	900000	2349006		19
20	Surface Water Quality Certification	662	34		2349	900000	2349009		20
21	Jury Duty	662	34		2349	900000	2349012		21
22	CY Reimbursements (i.e. telephone)	662	34		2349	900000	2349014		22
*23	UST Owner's List	783	24	2500	9696	900000	4969201		*23
*24	Hazardous Waste Notifiers List	783	24	2500	9696	900000	4969202		*24
*25	UST Maps	783	24	2500	9696	900000	4969203		*25
*26	UST Owner's Update	783	24	2500	9696	900000	4969205		*26
*28	Hazardous Waste Regulations	783	24	2500	9696	900000	4969207		*28
*29	Radiologic Tech. Regulations	783	24	2500	9696	900000	4969208		*29
*30	Superfund CERLIS List	783	24	2500	9696	900000	4969211		*30
31	Solid Waste Permit Fees	783	24	2500	9696	900000	4969213		31
32	Smoking School	783	24	2500	9696	900000	4969214		32
*33	SWQB - NPS Publications	783	24	2500	9696	900000	4969222		*33
*34	Radiation Licensing Regulation	783	24	2500	9696	900000	4969228		*34
*35	Sale of Equipment	783	24	2500	9696	900000	4969301		*35
*36	Sale of Automobile	783	24	2500	9696	900000	4969302		*36
*37	Lust Recoveries	783	24	2500	9696	900000	4969614		**37
*38	Lust Repayments	783	24	2500	9696	900000	4969615		**38
39	Surface Water Publication	783	24	2500	9696	900000	4969801		39
40	Exxon Reese Drive Ruidoso - CAF	783	24	2500	9696	900000	4969242		40
41	Emerg. Hazardous Waste Penalties NOV	957	32	9600	1696	900000	4164032		41
42	Radiologic Tech. Certification	987	05	0500	1696	900000	4169005		42
44	Ust Permit Fees	989	20	3100	1696	900000	4169020		44
45	UST Tank Installers Fees	989	20	3100	1696	900000	4169021		45
46	Food Permit Fees	991	26	2600	1696	900000	4169026		46
43	Other								43

* Gross Receipt Tax Required

** Site Name & Project Code Required

TOTAL 690.00

Contact Person: ED MARTIN Phone: 827-7151 Date: 11/16/00

Received in ASD By: _____ Date: _____ RT #: _____ ST #: _____

FSB025
Revised 07/07/00

EL PASO
FIELD SERVICES

November 8, 2000

New Mexico Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505

Dear Sirs:

Please find enclosed one signed copy of the Discharge Plan approval conditions for the following El Paso Field Services Co. facilities:

Angel Peak Compressor Station – Discharge Plan GW-189

Ballard Compressor Station – Discharge Plan GW-212

Kutz Compressor Station - Discharge Plan GW-186.

The flat fee for each of theses facilities will be forwarded under a separate cover as soon as the checks are received from EPFS accounts payable.

Sincerely yours,

David Bays

David Bays, REM
Principal Environmental Scientist

El Paso Field Services Company 614 Reilly Avenue Farmington, New Mexico 87401 Phone (505) 325-2841 Fax (505) 599-2235

EL PASO
FIELD SERVICES

AUG 3 1

August 17, 2000

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

RE: Discharge Plan Renewal – Ballard Compressor Station – Discharge Plant GW-212

Dear Sir:

Please find enclosed the renewal application and $50.00 filing fee for the El Paso Field Services Co. Ballard Compressor Station, Discharge Plan GW-212.

EPFS has operated the Station in accordance with Discharge Plan GW-212. Sections in the renewal application which are unchanged from the original discharge plan are indicated as "See On File." The only sections of the Discharge Plan which have changed are contact names and telephone numbers. If you need any additional information regarding this application, please call me at (505) 599-2256.

Sincerely yours,

David Bays

David Bays, REM
Principal Environmental Scientist

cc: Ballard Regulatory file

El Paso Field Services Company 614 Reilly Avenue Farmington, New Mexico 87401 Phone (505) 325-2841 Fax (505) 599-2235

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 Departments
Oil Conservation Division
2040 South Pacheco Street
Santa Fe, New Mexico 87505
(505) 827-7131

Revised 12/1/95

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

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

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

☐ New ☒ Renewed ☐ Modification

1. Type: Ballard Compressor Station, Discharge Plan No. GW-212
2. Operator: El Paso Field Services Co.

   Address: 614 Reilly Ave. Farmington, NM 87401

   Contact Person: David Bays Phone (505) 599-2256
3. Location: SW/4 NW/4 Section 20 Township 27 North Range 10 West
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. **Submitted with original Discharge Plan application - no modifications**
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 daily quality and daily volume of waste water must be included.
8. Attach a description of current liquid waste and solid waste collection/treatment/disposal systems.
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 rules, regulations, and/or orders.
14. CERTIFICATION

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

NAME: David Bays Title: Principal Environmental Scientist

Signature: David Bays Date: August 17, 2000

EL PASO FIELD SERVICES COMPANY

BALLARD COMPRESSOR STATION

DISCHARGE PLAN GW-212

Renewal Application August 17, 2000

Prepared for:

NEW MEXICO OIL CONSERVATION DIVISION

2040 S. Pacheco

Santa Fe, New Mexico 87505

El Paso Field Service Co.
614 Reilly Avenue
Farmington, NM 87401
(800) 203-1347

This Discharge Plan has been prepared in accordance with Oil Conservation Division "Guidelines for the Preparation of Ground Water Discharge Plans at Natural Gas Processing Plants".

I. Type of Operation

See On File

II. Operator/Legally Responsible Party and Local Representative

Legally Responsible Party:	Mr. Robert Cavnar El Paso Field Services Company 1001 Louisiana P. O. Box 2511 Houston, TX 77252 (713) 420-4288
Environmental Manager:	Mr. Doug Jordan El Paso Field Services Company 1001 Louisiana P. O. Box 2511 Houston, TX 77252 (713) 420-6192
Operations Manager:	Mr. Ron Sipe El Paso Field Services Company 614 Reilly Avenue Farmington, NM 87401 (505) 599-3241

III. Location of Facility

See On File

IV. Landowner

See On File

V. Facility Description

See On File

VI. Sources, and Quantities of Effluent

See On File

VII. Transfer and Storage of Process Fluids and Effluent

See On File

VIII. Effluent Disposal

Offsite Disposal

All liquids from this site are handled in accordance with NMOCD and NMED regulations. Liquids from this site will be discharged into existing tanks on site. All liquids will be removed from the site by EPFS. All liquids will be recycled if possible.

Hauling Agent
Dawn Trucking
16 County Road 5860
Farmington, NM 87401

Oily waste water is transported to the EPFS Kutz Hydrocarbon Recovery Facility located on County Road 4900, east of U. S. Highway 544. Produced water is transported to the Basin Disposal salt water injection well located at 6 County Road 5046 in Bloomfield.

Burlington is responsible for liquids disposal from the 62 barrel fiberglass tank and 210 barrel oil storage tank.

Oil Hauling Agent:
Giant Oil Transportation Inc.
4551 Heffera Road
Bloomfield, NM 87413

Oil Final Disposal:
Giant Refinery
89 Road 4990
Bloomfield, NM 87413

Water Hauling Agent:
Three Rivers Trucking
603 E. Murray Drive
Farmington, NM 87402

or

Dawn Trucking
318 E. Highway 64
Farmington, NM 87402

Water Final Disposal:
McGrath salt Water Disposal Well
Block B, Sec. 34, T34N, R12W

IX. Inspection, Maintenance and Reporting

See On File

X. Spill/Leak Prevention and Reporting (Contingency Plans)

See On File

XI. Site Characteristics

See On File

XIII. Affirmation

I here by certify that I am familiar with the information contained in and submitted with this discharge plan for the Ballard Compressor Station, and that such information is true, accurate, and complete to the best of my knowledge and belief.

David Bays

David Bays, REM
Principal Environmental Scientist

Date: August 17, 2000

NEW MEXICO OIL CONSERVATION DIVISION
ENVIRONMENTAL BUREAU
MEMO TO FILE

Date: August 15, 2000
Action: Phone conversation Ed Martin and David Bays
Subject: Discharge Plan Renewals

I reminded David about these renewals:

GW - 209	El Paso Natural Gas Lindrith Compressor Station
GW - 211	El Paso Natural Gas Largo Plant Compressor Station
GW - 212	El Paso Natural Gas Ballard Plant Compressor Station

He said he would get right to work on it and they would be coming soon.

Ed Martin

NEW MEXICO ENERGY, MINERALS
& NATURAL RESOURCES DEPARTMENT

Jennifer A. Salisbury
CABINET SECRETARY

Oil Conservation Div.
Environmental Bureau
2040 S. Pacheco
Santa Fe, NM 87505

Memorandum of Meeting or Conversation

Telephone __X___
Personal _____

Time: 3pm
Date: January 6, 2000

Originating Party: **Wayne Price-OCD**

Other Parties: **Richard Duarte-El Paso Nature Gas Co. 505-831-7763, fax 505-831-7739, E-Mail DUARTER@EPENERGY.COM**

Subject: **Discharge Plan Renewal Notice for the following El Paso Natural Gas Co. Facilities:**

GW-174 White Rock expires 2/08/2000
GW-173 Gallup Comp expires 2/08/2000
GW-211 Largo Comp expires 8/24/2000
GW-212 Ballard Comp expires 8/24/2000
GW-209 Lindrith Comp expires 8/24/2000

WQCC 3106.F. If the holder of an approved discharge plan submits an application for discharge plan renewal at least 120 days before the discharge plan expires, and the discharger is not in violation of the approved discharge plan on the date of its expiration, then the existing approved discharge plan for the same activity shall not expire until the application for renewal has been approved or disapproved. A discharge plan continued under this provision remains fully effective and enforceable. An application for discharge plan renewal must include and adequately address all of the information necessary for evaluation of a new discharge plan. Previously submitted materials may be included by reference provided they are current, readily available to the secretary and sufficiently identified to be retrieved. [12-1-95]

Discussion:
Discussed WQCC 3106F and gave El Paso Natural Gas Notice to submit Discharge Plan renewal application with $50.00 filing fee for the above listed facilities.
Conclusions or Agreements:

Signed: _____

CC: David Bays-El Paso Energy & Richard Duarte EPNG
505-599-2256 Fax 505-599-2119

EPFS

EL PASO FIELD SERVICES

September 4, 1996

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

Re: Facility Closure Plan Revision - Ballard Compressor Station
Discharge Plan GW-212

Dear Mr. Anderson:

In accordance with Mr. Chris Eustice's letter of June 30, 1995, this is to notify you that El Paso Field Services Company (EPFS) has completed the construction and demolition project at the Ballard Station.

1. No soil contamination was found around or under the old compressor station foundation at the Ballard Plant.

2. The old compressors, motors, piping, valves, the compressor building, and ancillary buildings were removed for resale by the demolition division of Philip Environmental, Inc. All concrete foundations were broken down to a depth of one foot below the natural grade, then covered with clean fill. The removed upper portions of the foundations were broken into easily manageable size, then buried on-site.

3. All asbestos containing material was removed by Philip Environmental and disposed of at an approved landfill.

If you need any additional information regarding the Ballard Station closure, please call me at (505) 599-2256.

Sincerely yours,

David Bays

David Bays, REM
Sr. Environmental Scientist

cc: Denny Foust - NMOCD - Aztec
R. D. Cosby/S. D. Miller/J. Sterrett/Ballard regulatory file

EPFS

EL PASO FIELD SERVICES

August 21, 1996

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

Re: Facility Closure Plan - Ballard Compressor Station - Discharge Plan GW-212

Dear Mr. Anderson:

In accordance with Mr. Chris Eustice's letter of June 30, 1995, this is to notify you that El Paso Field Services Company (EPFS) has completed the construction and demolition project at the Ballard Station.

1. Soil contamination around the old compressor station was remediated in accordance with OCD's "Spill, Leak Remediation Guidelines." Excavated soil was transported to the Envirotech landfarm for remediation.

2. The old compressors, motors, piping, valves, the compressor building, and ancillary buildings were removed for resale by the demolition division of Philip Environmental, Inc. All concrete foundations were broken down to a depth of one foot below the natural grade, then covered with clean fill. The removed upper portions of the foundations were broken into easily manageable size, then buried on-site.

3. All asbestos containing material was removed by Philip Environmental and disposed of at an approved landfill.

If you need any additional information regarding the Ballard Station closure, please call me at (505) 599-2256.

Sincerely yours,

David Bays

David Bays, REM
Sr. Environmental Scientist

cc: Denny Foust - NMOCD - Aztec
R. D. Cosby/S. D. Miller/J. Sterrett/Ballard regulatory 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

June 30, 1995

CERTIFIED MAIL
RETURN RECEIPT NO. P-176-012-151

Mr. David Bays
El Paso Natural Gas Company
P.O. Box 4990
Farmington, New Mexico 87499

Re: Facility Closure Plan

Dear Mr. Bays:

The New Mexico Oil Conservation Division (OCD has completed a review of El Paso Natural Gas Company's (EPNG) May, 1995 "PROPOSED DEMOLITION PLAN" which was received by the OCD May 15, 1995. This document contains EPNG's plan for closure of six (6) facilities in the San Juan Basin. The six facilities are:

- Angel Peak
- 3B-1
- Kutz Plant
- Lindrith Plant
- Largo Plant
- Ballard Plant

The above referenced facility closure plan is approved with the following conditions:

1. All soil samples for verification of completion of remedial activities will be sampled and analyzed for benzene, toluene, ethylbenzene, xylene and total petroleum hydrocarbons in accordance with the OCD's "SPILL, LEAK REMEDIATION GUIDELINES".

2. EPNG will notify the OCD-Environmental Bureau Chief and the OCD Aztec District Office within 24 hours of the discovery of groundwater contamination related to any facility closure activity.

3. For each facility closed, upon completion of all closure activities, EPNG will submit to the OCD for approval a completed closure report which will detail the

final results of each facility closure describing all assessments, dirt work, pit closures, and any other associated remedial activity.

4. All wastes removed from any of the facilities will be disposed of at an OCD approved facility.

5. All original documents submitted for approval will be submitted to the OCD Santa Fe Office with copies provided to the OCD Aztec Office.

Please be advised that OCD approval does not relieve EPNG of liability should closure activities determine that contamination exists which is beyond the scope of the work plan or if closure activities fail to adequately remediate contamination related to the facility. In addition, OCD approval does not receive EPNG of responsibility for compliance with any other federal, state or local laws and/or regulations.

If you have any questions, please call me at (505) 827-7153.

Sincerely,

Chris Eustice
Environmental Geologist

cc: OCD Aztec Office - Denny Foust

El Paso Natural Gas Company

P. O. Box 4990
FARMINGTON, NM 87499
PHONE: 505-599-2202

April 6, 1995

Certified Mail
Return Receipt Number P 645 521 837

Mr. William L. LeMay, Director
New Mexico Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505

Re: Proposed Demolition Plan

Dear Mr. LeMay:

El Paso Natural Gas Company is constructing six new compressor stations to replace six existing "grandfathered" stations. These station are:

Facility	Estimated Start of Demolition
Angel Peak	June 19, 1995
3B-1	July 3, 1995
Kutz Plant	July 3, 1995
Lindrith Plant	September 4, 1995
Largo Plant	September 18, 1995
Ballard Plant	October 9, 1995

A plan for removal and disposition of the existing station is attached. For any additional information needed, please contact me at the above address, or at (505) 599-2256.

Sincerely yours,

David Bays

David Bays, REM
Sr. Environmental Scientist

cc: w/o attachments
Mr. David Hall
Ms. Sandra Miller

EL PASO NATURAL GAS COMPANY
COMPRESSOR STATION CLOSURE PLAN

I. ENGINES, COMPRESSORS. PIPING, AND ANCILLARY STATION EQUIPMENT

All usable station hardware will be either reused by EPNG or sold for reuse in natural gas service. Unusable equipment will be sold as scrap metal.

II. HAZARDOUS WASTE

EPNG does not anticipate generating any hazardous waste during the demolition project. However, any wastes generated which are determined to be hazardous as defined by EPA and NMED regulations will be disposed of off-site at a properly permitted hazardous waste disposal facility.

III. SPECIAL WASTE

A. Insulation

All insulation will be checked to determine presence of asbestos. Any asbestos containing material (ACM) will be disposed of in an approved ACM landfill. Non-asbestos insulation will be disposed of as solid waste.

B. Used Oil

All used oil will be containerized and transported off-site for recycling. If an oil spill occurs, the contractor will take immediate steps to contain the spill and recover as much free liquid as is possible. Spill notifications will be made in accordance with NMOCD Rule 116.

C. Used Antifreeze

Glycol based coolants will be reused to the extent possible. If the coolant is not reusable, it will be either recycled or disposed off-site in accordance with OCD regulations.

D. Oil/Hydrocarbon Contaminated Soil

Presence of oil or hydrocarbon contamination will be determined using a Photo-ionization Detector (PID). All soils containing oil or hydrocarbons over 100 ppm will remediated in accordance with NMOCD Guidelines for Remediation of Leaks, Spills, and Releases.

E. Pits, Ponds, or Lagoons

Pits or ponds (if any) which do not meet current OCD guidelines for leak detection and secondary containment will be closed in accordance with NMOCD Unlined Surface Impoundment Closure Guidelines. For any pits or ponds which require closure and/or remediation, a site specific closure plan will be developed. The site specific plans will address remediation methods and procedures for determining any potential groundwater impact.

F. Chlorofluorocarbons

If any refrigeration equipment is to be removed, it will first have all freon evacuated for reuse in other similar equipment.

IV. BUILDING FOUNDATIONS

Steel foundation supports and tie downs will be sold as scrap metal. All above ground sections of concrete, including the above grade portions of the compressor building foundations, will be removed or demolished to a depth of 12 inches below grade. The removed and/or demolished concrete will be placed in the existing station basement for on-site burial.

V. GENERAL DEMOLITION DEBRIS

All non-degradable inert waste (rocks, concrete, etc.) generated by the demolition will be placed in the basement of the existing compressor building for burial on-site. Degradable waste (scrap lumber, vegetation, etc.) will be transported off-site for disposal at an approved public landfill.

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, 2040 South Pacheco, Santa Fe, New Mexico 87505, Telephone (505) 827-7131:

(GW-209)-El Paso Natural Gas Company, David Bays, Senior Environmental Scientist, P.O. Box 4990, Farmington, New Mexico 87499, has submitted a discharge plan application for their Lindrith Compressor Station located in the NE/4 SE/4, Section 18, Township 24 North, Range 5 West, NMPM, Rio Arriba County, New Mexico. Approximately 86 gallons perday of process wastewater with total dissolved solids concentration of 3500mg/L is stored in a below grade, closed top steel tank with positive leak detection prior to offsite dispoaal at an OCD approved facility; Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 750 feet with a total dissolved solids concentration of approxim[illegible] 760 mg/L. The discharge p[illegible] addresses how spills, leaks, and other accidental discharges to the aurface 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 public hearing may be requested by any interested person. Requests for public hearing shall set forth the reasons why a hearing should be held. A hearing will be held if the Director determines there is significant public interest.

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

GIVEN under the Seal of New Mexico Oil Conservation Commission at Santa Fe, New Mexico, on this 7th day of July, 1995.

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

Journal: July 17, 1995

FILE COPY

STATE OF NEW MEXICO
County of Bernalillo SS

RECEIVED
AUG - 7 1995

Bill Tafoya being duly sworn declares and says that he is Classified Advertising manager of **The Albuquerque Journal**, and that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Laws of 1937, and that payment therefore has been made of assessed as court cost; that the notice, copy of which is hereto attached, was published in said paper in the regular daily edition, for [illegible] times, the first publication being of the 17 day of July, 1995, and the subsequent consecutive publications on [illegible], 1995

Bill Tafoya

Sworn and subscribed to before me, a notary Public in and for the County of Bernalillo and State of New Mexico, this 17 day of July 1995

OFFICIAL SEAL
Corrina Duncan
NOTARY PUBLIC
STATE OF NEW MEXICO
My Commission Expires: [illegible]

PRICE 24.29

Statement to come at end of month.

Corrina Duncan

CLA-22-A (R-1/93) ACCOUNT NUMBER 130937

D

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, 2040 South Pacheco, Santa Fe, New Mexico 87505 Telephone (505) 827-8177:

(GW-211) - El Paso Natural Gas Company, David Bays, Senior Environmental Scientist, P.O. Box 4990, Farmington, New Mexico 87499, has submitted a discharge plan application for their Largo Plant Compressor Station located in Section 15, Township 26 North, Range 7 West, NMPM, Rio Arriba County, New Mexico. Approximately 115 gallons per day of process wastewater with total dissolved solids concentration of approximately 3500 mg/l is stored in an above grade, closed top steel tank prior to offsite disposal at an OCD approved facility. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 255 feet with a total dissolved solids concentration of approximately 542 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-212) - El Paso Natural Gas Company, David Bays, Senior Environmental Scientist, P.O. Box 4990, Farmington, New Mexico 87499, has submitted a discharge plan application for their Ballard Plant Compressor Station located in the SE/4 NE/4 and the NE/4 SE/4 of Section 26, Township 26 North, Range 9 West, NMPM, San Juan County, New Mexico. Approximately 2 gallons per day of process wastewater with total dissolved solids concentration of approximately 3500 mg/l is stored in an above grade, closed top steel tank prior to offsite disposal at an OCD approved facility. Groundwater most likely to be affected in the event of an accidental discharge is at a depth of approximately 440 feet with a total dissolved solids concentration of approximately 820 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-213) - Llano, Inc., Ed Sloman, 921 West Sanger, Hobbs, New Mexico 88240, has submitted a discharge plan application for their Strata Compressor Station located in the NE/4 NE/4 of Section 22, Township 23 South, Range 34 East, NMPM, Lea County, New Mexico. All wastes generated will be stored in closed top above ground storage tanks prior to offsite disposal or recycling at an OCD approved site. Ground water most likely to be affected in the event of an accidental discharge is at a depth of approximately 236 feet with a total dissolved solids concentration of approximately 1253 mg/l. The discharge plan addresses how spills, leaks, and other accidental discharges to the surface will be managed.

(GW-214) -POOL Company, Mr. Timothy Parker, (505)-393-5161, P.O. BOX 1198, Hobbs, NM, 88240-1198 has submitted a Discharge plan application for their Hobbs facility located in the SW/4 SW/4, Section 36, Township 18 South, Range 37 East, NMPM, Lea County, New Mexico. All effluents that may be generated at the facility will be collected in a closed top tank and transported offsite for disposal at an OCD approved facility; Groundwater most likely to be affected by a spill, leak, or accidental discharge to the surface is at a depth of approximately 65 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.

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 Oil Conservation Division at Santa Fe, New Mexico, on this 20th day of July, 1995.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

WILLIAM J. LEMAY, Director

NO EFFECT FINDING

The described action will have no effect on **listed species, wetlands,** or other important wildlife resources.

Date 8/7/95

Consultation # GWOCD95-1

Approved by _____

U.S. FISH and WILDLIFE SERVICE
NEW MEXICO ECOLOGICAL SERVICES FIELD OFFICE
ALBUQUERQUE, NEW MEXICO

NOTICE OF PUBLICATION

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

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GIVEN under the Seal of New Mexico Oil Conservation Division at Santa Fe, New Mexico, on this 20th day of July, 1995.

STATE OF NEW MEXICO
OIL CONSERVATION DIVISION

SEAL

WILLIAM J. LEMAY, Director

ACKNOWLEDGEMENT OF RECEIPT
OF CHECK/CASH

I hereby acknowledge receipt of check No. [redacted] dated 7/13/95,
or cash received on 8/3/95 in the amount of $ 50.00
from El Paso Natural Gas
for Ballard C.S. GW-212
(Facility Name) (DP No.)
Submitted by: _____ Date: _____
Submitted to ASD by: R. Anderson Date: 8/8/95
Received in ASD by: Angie Allen Date: 8/9/95

Filing Fee X New Facility ___ Renewal ___

Modification ___ Other _____
(specify)

Organization Code 521.07 Applicable FY 96

To be deposited in the Water Quality Management Fund.

Full Payment ___ or Annual Increment ___

THIS MULTI TONE AREA OF THE DOCUMENT CHANGES COLOR GRADUALLY AND EVENLY FROM DARK TO LIGHT WITH DARKER AT [redacted]

El Paso Natural Gas Company
P.O. BOX 1492
EL PASO, TX 79978

232 CBD
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07/13/95
Date

PAYABLE AT
CITIBANK DELAWARE
A SUBSIDIARY OF CITICORP
ONE PENN'S WAY
NEW CASTLE, DE 19720

PAY AMOUNT
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Void After 1 Year

PAY TO THE ORDER OF
NMED WATER QUALITY MANAGEMENT
2040 S PACHECO
SANTA FE NM 87505

John M. Green

COPYBAN® ANTI-FRAUD PROTECTION - PATENTS 4,210,346; 4,227,720; 4,310,180; 5,197,760

[redacted]

Ballard

El Paso Natural Gas Company

P. O. Box 4990
FARMINGTON, NM 87499
PHONE: 505-599-2202

July 14, 1995

Certified Mail
Return Receipt Number P 645 521 860

William L. LeMay, Director
New Mexico Oil Conservation Division
2040 S. Pacheco
Santa Fe, NM 87505

Re: New Discharge Plan GW212
Ballard Plant
San Juan County, NM

Dear Mr. LeMay:

El Paso Natural Gas Company is proposing to construct a new compressor station to replace the existing "grandfathered" Ballard Plant. The new station will consist of two reciprocating engine and compressor units along with normal ancillary station equipment. We currently anticipate that the new station will go on line on November 10, 1995. The existing facility will be dismantled following start up of the new units. A site investigation/remediation plan for the removal of the old station is being developed, and will be submitted under a separate cover.

I have enclosed two copies of the Discharge Plan application for the new facility, along with a check for the required $50.00 filing fee. An additional copy of the application has been forwarded to the OCD district office in Aztec, NM under a separate cover.

For any additional information needed, please contact me at the above address, or at (505) 599-2256.

Sincerely yours,

David Bays

David Bays, REM
Sr. Environmental Scientist

cc: Mr. Denny Foust - NMOCD, Aztec

EL PASO NATURAL GAS COMPANY

BALLARD PLANT DISCHARGE PLAN

JULY 1995

Prepared for:

NEW MEXICO OIL CONSERVATION DIVISION

2040 S. Pacheco

Santa Fe, New Mexico 87505

El Paso Natural Gas Company
100 N. Stanton
El Paso, Texas 79901
(915) 541-2600

This Discharge Plan has been prepared in accordance with Oil Conservation Division "Guidelines for the Preparation of Ground Water Discharge Plans at Natural Gas Processing Plants."

I. Type of Operation

El Paso Natural Gas Company (EPNG) proposes to install two 3335 Horsepower (site rated 3100 Horsepower each) Caterpillar G3612 reciprocating engines equipped with Ariel compressors. The units will compress approximately 30 MMSCFD of natural gas from low pressure San Juan Field lines 100 psig design pressure) to an existing line (16" 260 psig design pressure). The site is located 7 miles east of Hwy. 44 on CR 7425 approximately 31 miles SE of Bloomfield, NM.

El Paso Natural Gas Company is the owner of, and will operate the compressor facility.

II. Operator/Legally Responsible Party and Local Representative

Legally Responsible Party:	Hugh A. Shaffer Vice President, Operations and Engineering El Paso Natural Gas Company 100N. Stanton El Paso, TX 79901 (915) 541-2600
Local Representative:	Ms. Sandra D. Miller Superintendent, Environmental Compliance El Paso Natural Gas Company 614 Reilly Ave. Farmington, NM 87401 (505) 599-2141 (24 hour) (505) 325-2841
Station Operator:	El Paso Natural Gas Company 614 Reilly Ave. Farmington, NM 87401 (505) 325-2841

III. Location of Facility

The proposed facility is located in the SE/4 of the NE/4, and the NE/4 of the SE/4 of Sec. 26, T-26-N, R-9-W, San Juan County, New Mexico. A topographic map is under Tab A. The Ballard Plant is located 7 miles east of Hwy. 44 on CR 7425, approximately 31 miles SE of Bloomfield, NM.

IV. Landowner

El Paso Natural Gas Company
100N. Stanton
El Paso, TX 79901
(915) 541-2600

V. Facility Description

A plot plan of the facility indicating location of fences, gates, foundations, and equipment on the facility is attached at Tab B.

VI. Sources, and Quantities of Effluent

A. Equipment

Main Gas Separator-Scrubber

Two (2) two phase inlet separators will separate the gas and liquids. A mixture of hydrocarbons and water will discharge to the 210 bbl. Hydrocarbon Liquids Tank. A maximum of approximately 100 barrels per year will be discharged into this tank. The exact volume of liquids will vary depending upon quality of the gas.

Gas Compressor Suction Scrubber

The Gas Compressor Suction Scrubber is a secondary scrubber contained on each of the two the Engine/Compressor skids, and installed downstream from the Main Gas Separators. Liquids removed by these vessels will be discharged to the Hydrocarbon Liquids Tank. The expected quantity of liquids to be discharged is thought to be negligible.

Engine/Compressor

Two 3335 HP (site rated at 3100 HP) engine driven compressors will be installed on the site. The engine/compressor units are mounted on common skids to be installed on a concrete foundation one foot above grade. The skids are constructed to contain incidental drips, small leaks from packing seals, spills and rain water, which are drained to a 160 bbl. Oily Water Tank. This 160 bbl. below grade tank is double walled steel, and is equipped with inspection ports to check for leaks in the inner tank.

A 210 gallon elevated lubricating makeup oil tanks is built into each of the two compressor skids. Any leaks or spills from the oil storage tanks will drain through the compressor skid drains into the 160 bbl. tank. No discharge of waste oil is anticipated.

Compressor Discharge Separator-Scrubber

A Separator-Scrubber will be installed on the discharge of the compressors to remove oil and water from the compressed gas. Approximately 0.33 GPD (120 gallons per year) will be discharged into the Hydrocarbon Liquids Tank.

Fuel Gas Filter/Separator

Fuel will be supplied from the compressor discharge line. A fuel gas filter/separator will be installed at the inlet of the fuel gas line. Separated liquids will be discharged to the Hydrocarbon Liquids Tank. Approximately 0.011 GPD (40 gallons per year) of a mixture of hydrocarbons and water will be discharged into the Hydrocarbon Liquids Tank.

Gas Dehydrator

The facility will have installed a dehydration unit along with a contact tower. The dehydration unit will have a 100 bbl. steel aboveground tank for storage of triethylene glycol, and a 500 gallon steel aboveground surge tank. The contact tower dimensions are 54" O.D. by 32 feet tall. The dehydrator also has an 160 bbl. double walled, steel, below grade tank to recover the condensate from the dehydrator overhead. Approximately 2 barrels per day of condensed water and hydrocarbons will drain into the Dehydrator Condensate Tank.

B. Lubricating Oil, Waste Lubricating Oil and Used Engine Oil Filters

One compressor oil filter will be replaced every month. Three engine oil filters will be replaced every month. The engine oil filters will be allowed to completely drain prior to disposal at the Crouch Mesa Landfill.

The fuel gas filter will be replaced as needed depending on the quality of the gas. The fuel gas filter will be allowed to drain and will be completely free of any liquids prior to disposal at the Crouch Mesa Landfill.

C. Vessel Summary

1) Hydrocarbon Liquids Tank - Approximately 500 gallons of oil and water per year

2) Oily Water Tank - Only incidental oil and water from spills on the compressor skid and rain water

3) Dehydrator Drip Tank - Approximately 2 gallons of hydrocarbons and water per day

D. Engine Cooling Water

A mixture of ethylene glycol and water will be used as cooling water. If it is necessary to drain the cooling water system for maintenance or repairs, the cooling water will be drained into steel drums or a small tank mounted on a pickup truck. After maintenance and/or repairs, the cooling water will be placed back into the cooling system. As this is a closed system, no operational discharge is expected.

VII. Transfer and Storage of Process Fluids and Effluent

A. Summary Information

Source	Onsite Collection
Main Gas Separator-Scrubber	210 bbl. Hydrocarbon Liquids Tank
Gas Compressor Suction Scrubber	210 bbl. Hydrocarbon Liquids Tank
Engine/Compressor Skid Drains	160 bbl. Oily Water Tank
Compressor Discharge Separator Scrubber	210 bbl. Hydrocarbon Liquids Tank
Fuel Gas Filter Separator	210 bbl. Hydrocarbon Liquids Tank
Dehydrator and Contact Tower	160 bbl. Dehydrator Condensate Tank

B. Water and Wastewater Schematic

The plot plan at Tab B indicates the location of the wastewater system components.

C. Specifications

Pipelines - All wastewater piping to both the 210 bbl. Hydrocarbon Liquids Tank and the 160 bbl. Oily-Water Tank are below ground.

D. Fluids Disposal and Storage Tanks

The hydrocarbons from the 210 bbl., and 160 bbl. storage tanks will be recycled. The water fraction from the tanks will be separated and discharged into a lined pond at the EPNG Kutz Separator. The oil fraction will be taken to an oil recycler. Additional information is provided in the Effluent Disposal Section below.

E. Prevention of Unintentional and Inadvertent Discharges

All storage tanks for fluids other than fresh water are bermed to contain a volume one-third greater than the tank contents. All above ground tanks will be placed on a gravel pad or placed on an elevated stand so that leaks can be visually detected. The below grade tanks are doubled walled steel and will have the interstitial area visually inspected monthly.

There will be no chemical or drum storage area. Drums utilized to contain engine cooling water, or waste oil will be removed from the site at the end of each working day. A copy of the Material Safety Data Sheets for ethylene glycol, triethylene glycol, and lubricating oil are under Tab D.

F. Underground Pipelines

All wastewater underground piping carrying waste liquids will be hydrostatically tested at a minimum of three pounds over operating pressure for a minimum of four hours.

VIII. Effluent Disposal

Offsite Disposal

All liquids from this site will be handled in accordance with OCD and NMED regulations. Liquids from this site are expected to be discharged into three tanks. All liquids will be removed from the site by EPNG personnel. All effluent will be recycled if possible.

EPNG will be responsible for liquids disposal from the 210 bbl., and 160 bbl. tanks, using the following hauling/disposal contracts:

Oil Hauling Agent:

	Three Rivers Trucking 603 E. Murray Drive Farmington, NM 87401 (505) 325-8017	or	Chief Transport Co. 604 West Piñon Farmington, NM 87401 (505) 325-2396

Water Hauling Agent:

	Three Rivers Trucking 603 E. Murray Drive Farmington, NM 87401 (505) 325-8017	or	Chief Transport Co. 604 West Pinyin Farmington, NM 87401 (505) 325-2396

and Final Disposal:	Oil: Hay Hot Oil, Inc. P.O. Box 2 Cortez, CO 81321 (303) 565-8637	Water: Kutz Separator Bloomfield, NM

The oil and water is sent to EPNG's Kutz Separator, located approximately 1-1/2 miles north of Bloomfield, NM on Highway 44, then approximately 1 mile east on County Road 4900. The oil and water are separated at this facility and the water is placed into an evaporation pond. The oil fraction is sent to Hay Hot Oil, Inc. Hay Hot Oil, Inc. has a recycling facility located at 24280 Road G.3 in Cortez, CO 81321.

IX. Inspection, Maintenance and Reporting

The site will be visited regularly by EPNG employees. The inlet separator area, filter separators, dehydration area, compressor area, and all storage tanks will be checked routinely for leaks or spills.

X. Spill/Leak Prevention and Reporting (Contingency Plans)

The compressor site will be graded and bermed so that precipitation and runoff does not cause water to enter or leave the process areas.

The 210 barrel tank will be set according to OCD guidelines so that the entire tank is exposed to visually detect leaks.

Since the site will be visited on a regular basis by EPNG personnel, any leaks, spills, and or drips will be identified. Regular scheduled maintenance procedures will also help to assure that the equipment remains functional and thus the possibility of spills or leaks is further minimized. The inspectors will notify EPNG Compliance upon discovery of any leaks which result in any soil contamination.

Leaks, spills, and drips will be handled in accordance with OCD Rule 116 as follows:

A) Small spills will be absorbed with soil and shoveled into drums for off-site disposal. If the soil is an "exempt" waste, the soil will be disposed at Envirotech or other OCD approved landfarm facility. If the soil is an "nonexempt" waste the soil will be characterized and disposed according to the analytical profile.

B) Large spills will be contained with temporary berms. Free liquids will be pumped out by a vacuum truck. Any hydrocarbon liquids will be recycled. Any contaminated soil will be disposed of as discussed in the paragraph above.

C) Verbal and written notification of leaks or spills will be made to OCD in accordance with Rule 116, and New Mexico Water Quality Control Commission Regulation 1-203.

D) All areas identified during operations as susceptible to leaks or spills will be bermed or otherwise contained to prevent the discharge of effluent.

E) EPNG personnel will carry oil absorbent booms in their trucks. The booms will be used as needed to contain any spills or leaks. The booms will be disposed according to OCD and NMED guidelines.

XI. SITE CHARACTERIZATION

The Ballard Compressor Station is located in the San Juan River drainage Basin, and within the Central portion of the San Juan structural basin. Topographic relief within 1 mile of the site is about 100 feet with elevations from 6400 to 6500 feet above sea level. The average annual precipitation in the area ranges from 8 to 10 inches. The area supports native grasses and small shrubs.

GEOMORPHOLOGY AND SOILS

Ballard Compressor Station is located in a relatively flat area to the west of Blanco Canyon. The Plant is located approximately 1 mile west of Blanco Canyon. The surface slopes from about 0 to 5 percent from the highest point, 6,400 feet at the compressor site to 6,500 feet in the immediate vicinity of the plant site. The soil association in the area of the compressor site include the Doak-Sheppard-Shiprock association (USSCS, 1977). This association consists of materials weathered from sedimentary rocks, principally sandstone and shale and deposited by eolian methods. The Doak-Sheppard-Shiprock association is well to excessively drained and has moderate to rapid infiltration rates.

REGIONAL GEOLOGY

The compressor station is located within the central part of the San Juan Basin. The deepest portion of the basin contains up to 15,000 feet of Paleozoic and Mesozoic sediments (Fassett and Hinds, 1971). Tertiary age rocks crop out to the east of the compressor site.

LOCAL GEOLOGY

The Ballard Compressor Station is located on a relatively flat plane composed of Quaternary eolian deposits derived from the sandstones and shales of the Nacimiento Formation, which overlies the Tertiary Ojo Alamo Sandstone. There are three water wells located at the Ballard Plant (See Table 1). EPNG water wells 1 and 2 show approximately 500 feet of overlying sand and shale of the Nacimiento Formation. The attached drillers logs for EPNG water well #3 reports that 948 feet of sand and, shale and minor amounts of clays were encountered.

HYDROLOGY AND GROUNDWATER QUALITY

Local Groundwater Hydrology and Quality

According to topographic maps published by New Mexico Oil Conservation Division to support "Vulnerable Area Order", R-7940-C, the Largo Compressor Station is located outside of the expanded vulnerable zone.

Records available from the State Engineers Office and from Stone et. al (1983) indicate 3 water wells within one mile of the compressor station (Topographic map). There are no spring located within the vicinity of the plant site.

Two of these wells were drilled by EPNG between May and June of 1957. These wells were drilled into the Nacimiento Formation to depths between 460 and 760 feet. A third well was drilled in October 1973. This well was completed possibly in the Ojo Alamo Sandstone or the Nacimiento Formation.

EPNG Well #1, is located at the plant. This well is completed in the Nacimiento Formation, and is screened between 352 and 489 feet, in the Nacimiento Formation and supplies the potable water for the Ballard Compressor Station. The aquifer appears to be confined, because the principle water bearing strata is at a depth of 440 feet, and the static water level is reported to be 215 feet below the ground surface. The drill log also shows 440 feet of predominately shale above the water bearing sand layer which could serve as a confining layer. The total dissolved solids reported from this aquifer was 820 ppm on 05/28/93.

EPNG Well #2 , is also located at the plant. This well is screened between 307 and 479 feet, in the Nacimiento Formation. The aquifer appears to be confined, because the principle water bearing strata is at a depth of 421 feet, and the static water level is reported to be 234 feet below the ground surface. The drill log also shows 421 feet of intermixed shale and sand overlying the water bearing zone. The total dissolved solids reported for this aquifer was 582 ppm on 05/28/93.

EPNG Well #3, is located at the plant. This well is screened in several places from 568 to 603, 643 to 657, 773 to 803, and from 849 to 938. These screened intervals are located in the Nacimiento Formation. This aquifer also appears to be under artesian conditions. The top screen is at 568 feet below ground level and the water is static at 230 feet below ground level. The drill log also shows 568 feet of intermixed shale and sand overlying the water bearing zones. The total solids reported for this aquifer was 522 parts per million on 07/13/72.

The local alluvial groundwater flow appears to move in a westerly direction along a gently slopping plain. The potable aquifer most likely to be affected is the Nacimiento. The plant gets its drinking water from this aquifer at a depth greater than 300 feet below the surface. Regional flow direction in the Nacimiento in the general vicinity of the plant is toward the northeast.

SURFACE WATER HYDROLOGY AND FLOODING POTENTIAL

The Ballard Compressor Station is located approximately 1 mile east of Blanco Canyon. There are no permanent surface waters in the immediate vicinity of the plant. Surface water drainage at the plant is to the west, in the direction of an unnamed arroyo. Blanco Canyon is an ephemeral stream located approximately 1 mile east of the plant that flows from south to north into Largo Canon. Largo Canon is the main ephemeral stream that flows southeast to northwest and eventually into the San Juan River that is located approximately 20 miles away. Flooding potential from the San Juan River to the site is negligible because the plant is well outside of the floodplain of the San Juan River. However, since the plant is located near an ephemeral stream there is a very slight potential of flooding from severe thunderstorms in the

area. Run-off from a severe storm posses no potential of flooding. Berms have been placed around each tank to minimize any contamination of surface waters by run-off from the plant.

Table 1. EPNG water wells located within one mile of the Ballard Plant.

Name	Location	Screen Interval
EPNG water well #1	NW/4, NE/4, SE/4 of Sec 26, T26N, R9W	352'- 489'
EPNG water well #2	SW/4, NE/4, SE/4 of Sec 26, T26N, R9W	307'- 479'
EPNG water well #3	NE/4, SE/4, NE/4 of Sec 26, T26N, R9W	568'-603', 643'-657', 773'-803', & 849'-938'

References Cited

Fasset, J.E. and J.S. Hinds, 1971, Geology and Fuel Resources of the Fruitland Formation and Kirkland Shale of the San Juan Basin, New Mexico and Colorado. USGS Professional Paper 676.

Geological Map of New Mexico, United States Geological Survey, 1967.

Geological Map of the Aztec 1° x 2° Quadrangle Northwestern New Mexico and Southern Colorado. USGS Miscellaneous Investigation Service, 1987.

Soil Survey of San Juan County New Mexico, United States Department of Agriculture Soil Conservation Service, 1980.

Stone, W.J., F.P. Lyford, P.F. Frenzel, N.H. Mizell, and E.T. Padgett, Hydrology and Water Resources of San Juan Basin, New Mexico. New Mexico Bureau of mines and Mineral Resources, Hydraulic Report 6, 1983.

White, W.E., Kues, G.E., Inventory of Springs in the state of New Mexico, United States Geological Survey, 1992.

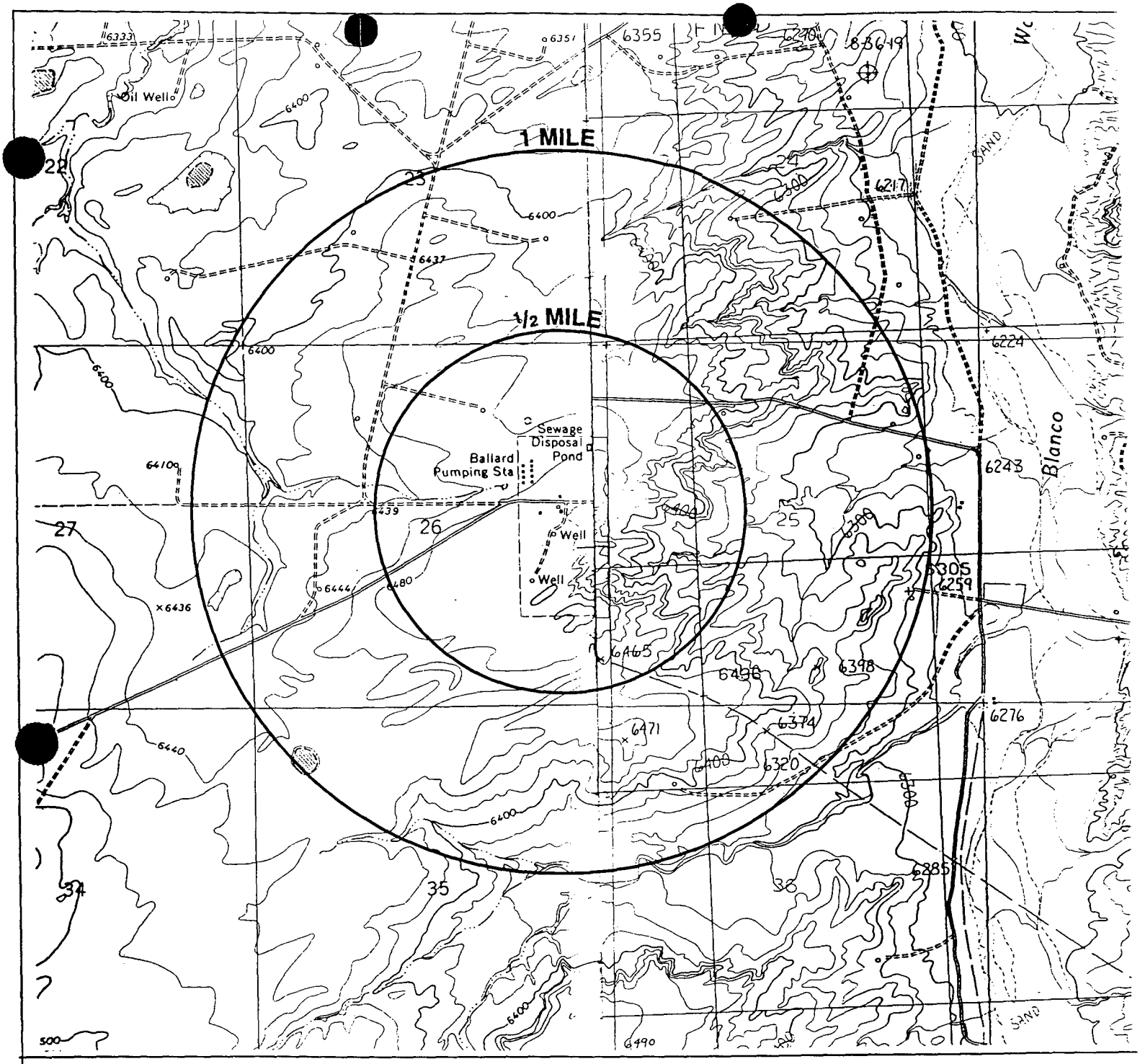
XIII. Affirmation

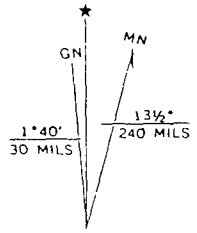
I here by certify that I am familiar with the information contained in and submitted with this discharge plan, and that such information is true, accurate, and complete to the best of my knowledge and belief.

David Bays

David Bays, REM
Sr. Environmental Scientist

Date: July 7, 1995





UTM GRID AND 1967 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

QUADRANGLE LOCATION

HUERFANO TRADING POST
7.5 MINUTE SERIES QUADRANGLE
PREPARED FOR: BALLARD DISCHARGE PLAN
PREPARED BY: EL PASO NATURAL GAS COMPANY
DATE: MAY 1, 1995

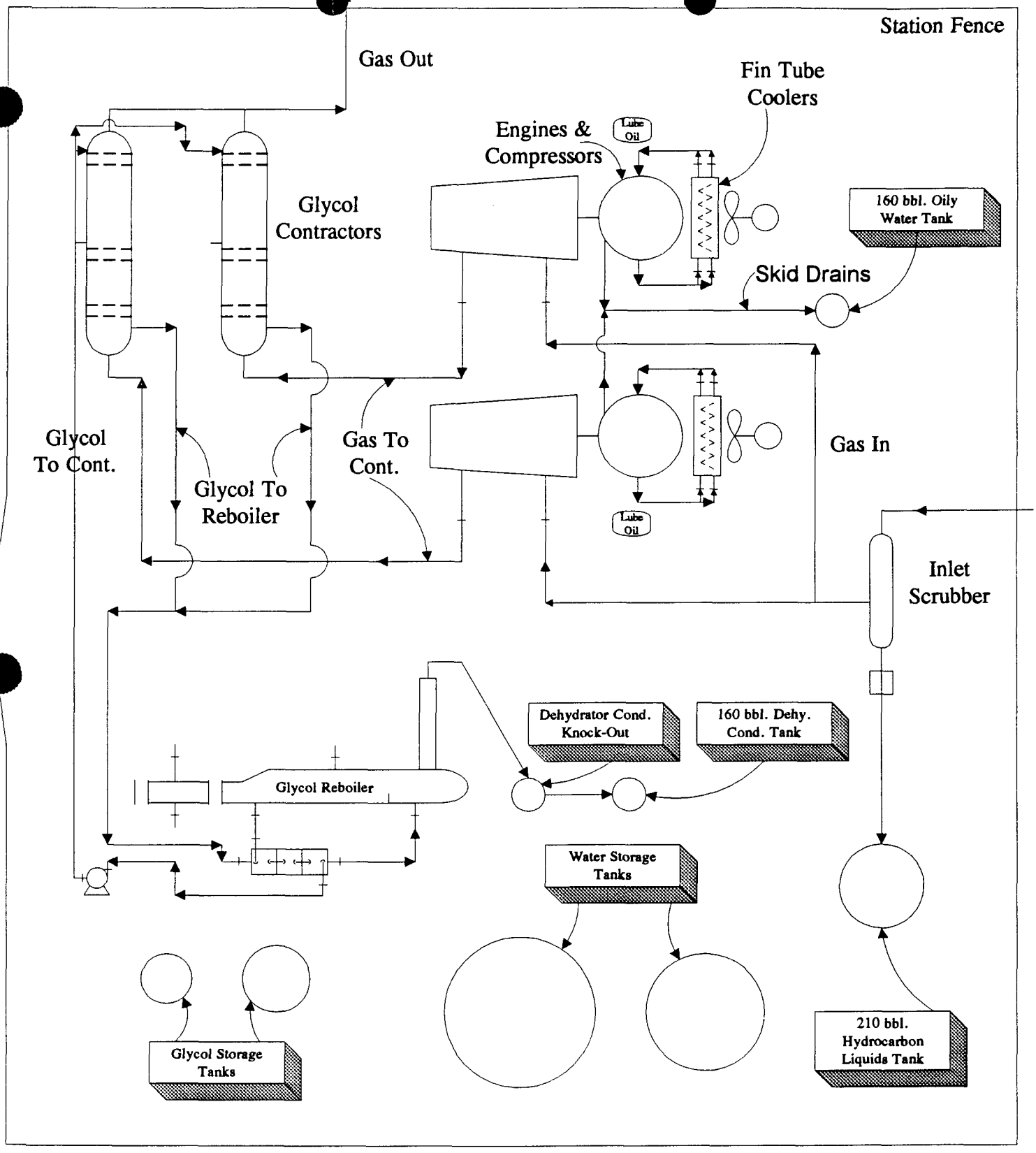
SCALE 1:24000

1 0 1 MILE

1000 0 1000 2000 3000 4000 5000 6000 7000 FEET

1 5 0 1 KILOMETER

CONTOUR INTERVAL 20 FEET
DATUM IS MEAN SEA LEVEL



El Paso Natural Gas Co.
Ballard Plant Discharge Plan
Scale: None
Drawn By: JDB 07/10/95

MESOZOIC AND CENOZOIC STRATIGRAPHY
SOUTH CENTRAL SAN JUAN BASIN
(After Thorn et. al., 1990)

CENOZOIC	QUARTERNARY	Alluvium
	TERTIARY	San Jose Formation Nacimiento Formation Ojo Alamo Formation
MESOZOIC	CRETACEOUS	Kirtland Shale Fruitland Formation Pictured Cliffs Sandstone Lewis Shale Mesaverde Group Mancos Shale Dakota Sandstone
	JURASSIC	Morrison Formation Wanakah Formation Entrada Sandstone
	TRIASSIC	Chinle Formation

EL PASO NATURAL GAS

MATERIAL SAFETY DATA SHEET

PRODUCT NAME: ETHYLENE GLYCOL

EPNG MSDS NO: 01433 DATE ISSUED: / /
PRODUCT ITEM NO: 0062246 LAST REVISED DATE: 11/01/1977

MANUFACTURER
NAME: AVAILABLE FORM MANY
ADDRESS: SUPPLIERS

CITY: EMERGENCY TELEPHONE: ( ) -
STATE: ZIP: 24 HOUR TELEPHONE:( ) -

NFPA HEALTH: FIRE: REACTIVITY:
CERCLA HEALTH: FIRE: REACTIVITY: PERSISTENCE:

MOLECULAR FORMULA: NA TRADE SECRET: N
MOLECULAR WEIGHT: NA TIER II REPORTABLE:

BOILING POINT: 387 F (197 C) EVAPORATION RATE: 1
MELTING POINT: NA VAPOR PRESSURE: @20C, MMHG:0.06
VISCOSITY: NA SPECIFIC GRAVITY: 0.000
VAPOR DENSITY: 2.1 WATER SOLUBILITY: COMPLETE

FLASH POINT : 232 F METHOD: TCC
AUTOIGNITION : 775 F LEL: 3.2 UEL: 15.3

PHYSICAL FORMS PURE: MIX: LIQUID: Y GAS: SOLID:

REMARKS:

PRODUCT SYNONYMS

**** N/A **** **** N/A ****

EL PASO NATURAL GAS

MATERIAL SAFETY DATA SHEET

PRODUCT NAME: ETHYLENE GLYCOL

SECTION I MATERIAL IDENTIFICATION

MATERIAL NAME: Ethylene Glycol

OTHER DESIGNATIONS: Glycol, 1,2-Ethanediol, HOCH2CH2OH, ASTM D2693, GE Material D5B38

SECTION II INGREDIENTS AND HAZARDS

INGREDIENT	%	HAZARD DATA
Ethylene Glycol	ca 100	Vapor* TLV 100 ppm or 260 mg/m3 Particulate* TLV 10 mg/m3 Human, oral LdLo 1.5 g/kg

* ACGIH (1977) TLV, no OSHA TLV established

SECTION III PHYSICAL DATA

BOILING POINT, 1 atm, deg F (c) 387 (197)
SPECIFIC GRAVITY (H2O=1): 1.12
VAPOR PRESSURE @ 20C, mm Hg: 0.06
EVAPORATION RATE (CC1=1): 1
VAPOR DENSITY (Air=1): 2.1
REFRACTIVE INDEX AT 25C: 1.430
SOLUBILITY IN WATER @ 20C: Complete
FREEZING POINT, Deg C: 12.7
MOLECULAR WEIGHT: 62.08
APPEARANCE AND ODOR: Colorless, odorless, sweet-tastign liquid. (Poisonous !).

SECTION IV FIRE AND EXPLOSION DATA

FLASH POINT AND METHOD: 232 (TCC)
AUTOIGNITION TEMP.: 775 F
LEL: 3.2
UEL: 15.3

EXTINGUISHING MEDIA: CO2, WATER, DRY CHEMICAL or ALCOHOL FOAM (especially for large fires). Cool fire-exposed containers with water. Spills may be flushed and diluted with water to reduce flammability.
Ethylene glycol, when heated or misted into the air, becomes a moderate fire and explosion hazard.

SECTION V REACTIVITY DATA

Ethylene glycol may react with oxidizing agents.

Ignition in air will generate oxides of carbon and nitrogen. Ethylene glycol is hygroscopic.

SECTION VI HEALTH AND HAZARD INFORMATION

Inhalation of high ethylene glycol concentrations produces symptoms similar to ethyl alcohol intoxication; pulmonary edema may also develop. The single lethal oral dose for humans is about 3-4 ounces or about 1.4 ml/kg. Sub-lethal ingestion can produce intoxication and coma. (Chronic feeding of ethylene glycol to rats - about 10% of the lethal dosage in daily diet for two years - shortened the life span and damaged kidney, bladder, and liver). Eye contact may cause discomfort. Skin contact may produce mild irritation, with some absorption through the skin possible from prolonged contact.

FIRST AID

INHALATION: Remove victim to fresh air. Get medical attention.

EYE CONTACT: Wash with plenty of running water for 10 minutes. Get medical attention.

SKIN CONTACT: Rinse off with water; then wash area with soap and water.

INGESITON: Give 3 glasses fo milk or water and induce vomiting at once ! Get medical attention.

SECTION VII SPILL, LEAK, AND DISPOSAL PROCEDURES

Notify safety personnel. Provide adequate ventilation. (Normal ventilation may be satisfactory if liquid is at room temperature and not misted into the air). Those handling spill emergencise should use proper protective equipment. Recover as much spilled material as feasible for disposal. Wash residue or small spills to the sewer with copious water. Large quantities of liquids may be disposed of by mixing with more flammable solvents and atomizing into an incinerator.

SECTION VIII SPECIAL PROTECTION INFORMATION

When ethylene glycol is heated, or agitated, or sprayed, proper exhaust hoods with 100 lfm face velocities should be used. Rubber gloves should be worn to prevent skin contact. Safety glasses or goggles should be worn in areas of use where splashing is possible. Eye wash stations should be available.

SECTION IX SPECIAL PRECAUTIONS AND COMMENTS

DO NOT TAKE INTERNALLY ! Heated and agitated solutions should have

EL PASO NATURAL GAS

MATERIAL SAFETY DATA SHEET

PRODUCT NAME: ETHYLENE GLYCOL

proper exhaust ventilation of area to prevent inhalation liquid particles and vapors.

EL PASO NATURAL GAS

MATERIAL SAFETY DATA SHEET

PRODUCT NAME: TRIETHYLENE GLYCOL - TECHNICAL

EPNG MSDS NO: 00037 DATE ISSUED: 06/08/1990
PRODUCT ITEM NO: 0012076 LAST REVISED DATE: / /

MANUFACTURER
NAME: DOW CHEMICAL USA
ADDRESS:

CITY: MIDLAND, EMERGENCY TELEPHONE: (517)636-4400
STATE: MI ZIP: 48674 24 HOUR TELEPHONE:( ) -

NFPA HEALTH: 0 FIRE: 0 REACTIVITY: 0
CERCLA HEALTH: 0 FIRE: 0 REACTIVITY: 0 PERSISTENCE: 0

MOLECULAR FORMULA: N/A TRADE SECRET: N
MOLECULAR WEIGHT: N/A TIER II REPORTABLE:

BOILING POINT: 545.9F EVAPORATION RATE: N/A
MELTING POINT: N/A VAPOR PRESSURE: <1.0 MMHG @ 20C
VISCOSITY: N/A SPECIFIC GRAVITY: 1.100
VAPOR DENSITY: 5.18 WATER SOLUBILITY: COMPLETELY

FLASH POINT : 350 F METHOD: PMCC
AUTOIGNITION : N/A LEL: N/A UEL: N/A

PHYSICAL FORMS PURE: MIX: LIQUID: Y GAS: SOLID:

REMARKS:
COLORLESS LIQUID; MILD ODOR

PRODUCT SYNONYMS

**** N/A **** **** N/A ****

EL PASO NATURAL GAS

MATERIAL SAFETY DATA SHEET

PRODUCT NAME: TRIETHYLENE GLYCOL - TECHNICAL

SECTION I MATERIAL IDENTIFICATION

N/A

SECTION II INGREDIENTS AND HAZARDS

Triethylene glycol CAS # 000112-27-6 99%

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

SECTION III PHYSICAL DATA

Boiling Point: 545.9F; 286C
Vapor Pressure: <1.0 mmHg @ 20C
Vapor Density: 5.18
Sol. in Water: Completely miscible
Sp. Gravity: 1.1 @ 25/25C
Appearance and Odor: Colorless liquid; mild odor.

SECTION IV FIRE AND EXPLOSION DATA

Flash Point: 350F; 177C
Method Used: PMCC
Flammable Limits
LFL: 0.9%
UFL: 9.2%
Extinguishing Media: Water fog, alcohol resistant foam, C02, dry chemical.
Fire Fighting Equipment: Wear positive pressure self-contained breathing apparatus.

SECTION V REACTIVITY DATA

Stability: (Conditions to Avoid) Will ignite in air at 700F.

Incompatibility: (Specific Materials to Avoid) Oxidizing material.

Hazardous Decomposition Products: Burning produces normal products of combusiton, including carbon monoxide, carbon dioxide, and water.

Hazardous Polymerization: Will not occur.

SECTION VI HEALTH AND HAZARD INFORMATION

Eye: Essentially nonirritating to eyes.
Skin Contact: Prolonged or repeated exposure may cause 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.
Ingestion: Single dose oral toxicity is low. The oral LD50 for rats is 16,800-22, 060 mg/kg.
Inhalation: No adverse effects are anticipated from inhalation.
Systemic and Other Effects: Based on available data, repeated exposures are not anticipated to cause any significant adverse effects. Did not cause cancer in long-term animal studies. Birth defects are unlikely. Exposures having no adverse effects on the mother should have no effect on the fetus. In animal studies, has been shown not to interfere with reproduction.
First Aid: Eyes: Irrigate immediately with water for at least five minutes. Skin: Wash off in flowing water or shower.
Ingestion: Induce vomiting if large amounts are ingested. Consult medical personnel.
Inhalation: Remove to fresh air if effects occur. Call a physician.
NOTE TO PHYSICIAN: No specific antidote. Supportive care.
Treatment based on judgment of the physician in response to the patient.
Handling Precautions:
Exposure Guideline: AIHA WEEL is 10 mg/m3 for polyethylene glycols.
Ventilation: Provide general and/or local exhaust ventilation to control airborne levels below the exposure guidelines.
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. In misty atmospheres, use an approved mist respirator.
Skin Protection: For brief contact, no precautions other than clean body-covering clothing should be needed. When prolonged or frequently repeated contact could occur, use protective clothing impervious to this material. Selection of specific items such as gloves, boots, apron or full-body suit will depend on operation. If hands are cut or scratched, use impervious gloves even for brief exposures.
Eye Protection: Use safety glasses.

SECTION VII SPILL, LEAK, AND DISPOSAL PROCEDURES

Small spills: Soak up with absorbent material and collect for disposal. Large spills: dike to prevent contamination of waterways, then pump into suitable containers for disposal.
Burn in an approved incinerator in accordance with all Local, State and Federal Laws and Regulations.

SECTION VIII SPECIAL PROTECTION INFORMATION

N/A

SECTION IX SPECIAL PRECAUTIONS AND COMMENTS

Practice reasonable care to avoid exposure.

EL PASO NATURAL GAS

MATERIAL SAFETY DATA SHEET

PRODUCT NAME: TRIETHYLENE GLYCOL - TECHNICAL

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

EL PASO NATURAL GAS

MATERIAL SAFETY DATA SHEET

PRODUCT NAME: NATURAL GAS ENGINE OIL

EPNG MSDS NO: 00403 DATE ISSUED: / /
PRODUCT ITEM NO: 0062150 LAST REVISED DATE: 06/21/1993

MANUFACTURER
NAME: MOBIL OIL CORPORATION
ADDRESS: 3225 GALLOWS ROAD

CITY: FAIRFAX, EMERGENCY TELEPHONE: (609)737-4411
STATE: VA ZIP: 22037 24 HOUR TELEPHONE:( ) -

NFPA HEALTH: FIRE: REACTIVITY:
CERCLA HEALTH: FIRE: REACTIVITY: PERSISTENCE:

MOLECULAR FORMULA: NA TRADE SECRET: N
MOLECULAR WEIGHT: NA TIER II REPORTABLE:

BOILING POINT: > 600F (316 C) EVAPORATION RATE: NA
MELTING POINT: NA VAPOR PRESSURE: < .1
VISCOSITY: @ 100C,CS:12.5 SPECIFIC GRAVITY: 0.000
VAPOR DENSITY: MMHG 20C: <0.1 WATER SOLUBILITY: NEGILGIBLE

FLASH POINT : > 450 F (232 C) METHOD: ASTM D-92
AUTOIGNITION : NA LEL: .6% UEL: 7.0%

PHYSICAL FORMS PURE: MIX: LIQUID: Y GAS: SOLID:

REMARKS:
24-HR EMER. CALL COLLECT 609/737-4411; CHEMTREC: (800) 662-4525;
PRODUCT AND MSDS INFORMATION: (800) 662-4525

PRODUCT SYNONYMS

**** N/A **** **** N/A ****

EL PASO NATURAL GAS

MATERIAL SAFETY DATA SHEET

PRODUCT NAME: NATURAL GAS ENGINE OIL

SECTION I MATERIAL IDENTIFICATION

SUPPLIER: MOBIL OIL CORPORATION
CHEMCIAL NAMES AND SYNONYMS: PET. HYDROCARBONS AND ADDITIVES
USE OR DESCRIPTION: NATURAL GAS ENGINE OIL
24-HR. EMERGENCY (CALL COLLECT): (609) 737-4411
CHEMTREC: (800) 424-9300
PRODUCT AND MSDS INFORMATION: (800) 662-4525

SECTION II INGREDIENTS AND HAZARDS

N/A

SECTION III PHYSICAL DATA

APPEARANCE: Dark Amber Liquid
ODOR: Mild
PH: NA
VISCOSITY AT 40 C, CS: 124.0
VISCOSTIY AT 100 C, CS: 12.5
FLASH POINT F(C): < 450(232) (ASTM D-92)
MELTING POINT F(C): NA POUR POINT F(C): 5(-15)
BOILING POINT F(C): > 600(316)
RELATIVE DENSITY, 15/4 C: 0.88
SOLUBILITY IN WATER: Negligible
VAPOR PRESSURE-mm Hg 20C: < .1

SECTION IV FIRE AND EXPLOSION DATA

FLASH POINT F(C): > 450(232) (ASTM D-92)

FLAMMABLE LIMITS. LEL: .6% UEL: 7.0%

EXTINGUISHING MEDIA: Carbon Dioxide, Foam, Dry Chemical and water fog

SPECIAL FIRE FIGHTING PROCEDURES:
Water OR foam may cause frothing. Use water to keep fire exposed containers cool. Water spray may be used to flush spills away from exposure. For fires in enclosed areas, firefighters must use self-contained breathing apparatus. Prevent runoff from fire control or dilution from entering streams, sewers, or drinking water supply.

UNUSUAL FIRE AND EXPLOSION HAZARDS: None

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

SECTION V REACTIVITY DATA

STABILITY (Thermal, Light, etc.): Stable
CONDITIONS TO AVOID: Extreme Heat
INCOMPATIBILITY (Materials to Avoid): Strong Oxidizers

PRODUCT NAME: NATURAL GAS ENGINE OIL

HAZARDOUS DECOMPOSITION PRODUCTS: Carbon monoxide, Sulfur Oxides
HAZARDOUS POLYMERIZATION: Will not occur.

SECTION VI HEALTH AND HAZARD INFORMATION
--- INCLUDES AGGRAVATED MEDICAL CONDITIONS, IF ESTABLISHED ---

THRESHOLD LIMIT VALUE: 5.00 mg/m3 Suggested for Oil Mist
EFFECTS OF OVEREXPOSURE: No significant effects expected.

********** EMERGENCY AND FIRST AID PROCEDURES **********
--- FOR PRIMARY ROUTES OF ENTRY ---

EYE CONTACT: Flush thoroughly with water. If irritation persists, call a physician.
SKIN CONTACT: Wash contact areas with soap and water.

INHALATION: Not expected to be a problem.

INGESTION: Not expected to be a problem. However, if greater than 1/2 litre(pint) ingested, immediately give 1 to 2 glasses of water and call a physician, hospital emergency room or poison control center for assistance. Do not induce vomiting or give anything by mouth to an unconscious person.

********** TOXICOLOGICAL DATA **********
--- ACUTE TOXICOLOGY ---

ORAL TOXICITY (RATS): Practically non-toxic (LD50 greater than 2000 mg/kg). ---Based on testing of similar products and/or the components.

DERMAL TOXICITY (RABBITS): Practically non-toxic (LD50: greater than 2000 mg/kg). --Based on testing of similar products and/or the components.

INHALATION TOXICITY (RATS): Not applicable --- Harmful concentration of mists and/or vapors are unlikely to be encountered through any customary or reasonably foreseeable handling, use, or misuse of this product.

EYE IRRITATION (RABBITS): Practically non-irritating. (Draize score: 0 or greater but 6 or less). -- Based on testing of similar products and/or the components.

SKIN IRRITATION (RABBITS): Practically non-irritating (Primary irritation index: 0.5 or less). -- Based on testing of similar products and/or the components.

--- SUBCHRONIC TOXICOLOGY (SUMMARY) ---

EL PASO NATURAL GAS

MATERIAL SAFETY DATA SHEET

PRODUCT NAME: NATURAL GAS ENGINE OIL

Severely solvent refined and severely hydrotreated mineral base oils have been tested at Mobil Environmental and Health Sciences Laboratory by dermal application to rats 5 days/week for 90 days at doses significantly higher than those expected during normal industrial exposure. Extensive evaluations including microscopic examination of internal organs and clinical chemistry of body fluids, showed no adverse effects.

--- CHRONIC TOXICOLOGY (SUMMARY) ---

The base oils in this product are severely solvent refined and/or severely hydrotreated. Chronic mouse skin painting studies of similar oils showed no evidence of carcinogenic effects.

SECTION VII SPILL, LEAK, AND DISPOSAL PROCEDURES
ENVIRONMENTAL IMPACT: In case of accident or road spill notify CHEMTREC (800) 424-9300. Report spills as required to appropriate authorities. U.S. Cosat Guard regulations require immediate reporting of spills that could reach any waterway including intermittent dry creeks. Report spill to Coast Guard toll free number (800) 424-8802.

PROCEDURES IF MATERIAL IS RELEASED OR SPILLED:

Absorb on fire retardant treated sawdust, diatomaceous earth, etc. Shovel up and dispose of at an appropriate waste disposal facility in accordance with current applicable laws and regulations, and product characteristics at time of disposal.

WASTE MANAGEMENT:

Product is suitable for burning in an enclosed, controlled burner for fuel value or disposal by supervised incineration. Such burning may b be limited pursuant to the Resource Conservation and Recovery Act. In additin, the product is suitable for processing by an approved waste disposal facility. Use of these methods is subject to user compliance with applicable laws and regulations and consideration of product characteristics at time of disposal.

SECTION VIII SPECIAL PROTECTION INFORMATION
EYE PROTECTION: Normal industrial eye protection practices should be employed.

SKIN PROTECTION: No special equipment required. However, good personal hygiene practices should always be followed.

RESPIRATORY PROTECTION: No special requirements under ordinary conditions of use and with adequate ventilation.

VENTILATION: No special requirements under ordinary conditions or use and with adequate ventilation.

SECTION IX SPECIAL PRECAUTIONS AND COMMENTS

No special precautions required.

GOVERNMENTAL INVENTORY STATUS: All components registered in accordance with TSCA and EINECS.

DOT:

Shipping Name: Not applicable
Hazard Class; Not applicable

US OSHA HAZARD COMMUNICATION STANDARD: Product assessed in accordance with OSHA 29 CFR 1910.1200 and determined not to be hazardous.
RCRA INFORMATION: The unused product, in our opiniou, is not specifically listed by the EPA as a hazardous waste (40 CFR, Part 261D nor is it formulated to contain materials which are listed hazardous wastes. It does not exhibit the hazardous characteristics of ignitabliity, corrosivity, or reactivity and is not formulated with contaminants as determined by the Toxicity Characteristic Leaching Procedure (TCLP). However, used product may be regulated.
U.S. Superfund Amendments and Reauthorization Act (SARA) Title III:
This product contains no "EXTREMELY HAZARDOUS SUBSTANCES".
SARA (311/312 - FORMERLY 302) REPORTABLE HAZARD CATEGROIES: None
This product contains no chemicals reportable under SARA (313) toxic release program.

THE FOLLOWING PRODUCT INGREDIENTS ARE CITED ON THE LISTS BELOW:

CHEMICAL NAME	CAS #	LIST CITATIONS
ZINC (Elemental analysis) (.05)	7440-66-6	22
PHOSPHORODITHOIC ACID, 0,0-DI C1 14-ALKYL ESTERS, ZINC SALTS (2:1) (ZDDP) (.41%)	68649-42-3	22

--- REGULATORY LISTS SEARCH ---

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

CARC = CARCINOGEN: SUS = SUSPECTED CARCINOGEN

NOTE: MOBIL PRODUCTS ARE NOT FORMULATED TO CONTAIN PCBS.

EL PASO NATURAL GAS

MATERIAL SAFETY DATA SHEET

PRODUCT NAME: NATURAL GAS ENGINE OIL

Information given herein is offered in good faith as accurate, but without guarantee. Conditions of use and suitablility of the product for particular uses are beyond our control; all risks of use of the product are therefore assumed by the user and WE EXPRESSLY DISCLAIM ALL WARRANTIES OF EVERY KIND AND NATURE, INCLUDING WARRANTIES OF MERCHANTABLIITY AND FITNESS FOR A PARTICULAR PURPOSE IN RESPECT TO THE USE OR SUITABLILTY OF THE PRODUCT. Nothing is itended as a recommendation for uses which infringe valid patents or as extending license under valid patents. Appropriate warnings and safe handling procuedures should be provided to handlers an users.

PREPARED BY: MOBIL OIL COPORATION
ENVIRONMENTAL HEALTH AND SAFETY DEPARTMENT, PRINCETON, NJ

FOR FURTHER INFORMATION CONTACT:
Mobil Oil Corporation, Product Formulation and Quality Control
3225 Gallows Road, Fairfax, VA 22037 (800) 227-0707 X3265

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

OIL CONSERVATION DIVISION

New Mexico DRUG FREE It's a State of Mind!

December 18, 1991

BRUCE KING
GOVERNOR

ANITA LOCKWOOD
CABINET SECRETARY

MATTHEW BACA
DEPUTY SECRETARY

CERTIFIED MAIL
RETURN RECEIPT NO. P-690-155-041

Mr. Richard Duarte
El Paso Natural Gas Company
P.O. Box 4990
Farmington, New Mexico 87499

Re: Below Grade Tank Installation
Ballard Compressor Station
San Juan County, New Mexico

Dear Mr. Duarte:

The Oil Conservation Division (OCD) has received your request, dated December 11, 1991, for authorization to install two below grade waste storage tanks. The tanks will be used to store waste fluids generated at the compressor station prior to offsite recycling or disposal.

Based on the information and construction specifications provided in your letter, installation and use of the requested below grade tanks is approved.

If you have any questions, please call me at (505) 827-5812.

Sincerely:

Roger C. Anderson
Environmental Engineer
Acting Bureau Chief

xc: Denny Foust - OCD Aztec

VILLAGRA BUILDING - 408 Galisteo
Forestry and Resources Conservation Division
P.O. Box 1948 87504-1948
827-5830
Park and Recreation Division
P.O. Box 1147 87504-1147
827-7465

2040 South Pacheco
Office of the Secretary
827-5950
Administrative Services
827-5925
Energy Conservation & Management
827-5900
Mining and Minerals
827-5970

LAND OFFICE BUILDING - 310 Old Santa Fe Trail
Oil Conservation Division
P.O. Box 2088 87504-2088
827-5800

El Paso Natural Gas Company
P. O. BOX 4990
FARMINGTON, NEW MEXICO 87499
PHONE (505) 325-2841

VIA OVERNIGHT MAIL

December 11, 1991

Roger Anderson, Acting Bureau Chief
Energy, Minerals and Natural Resources Department
New Mexico Oil Conservation Division
Post Office Box 2088
Santa Fe, New Mexico 87504

Re: Request for approval to install two underground tanks at El Paso Natural Gas Company's (El Paso) Ballard Compressor Station.

Dear Mr. Anderson:

Enclosed for your review is the schematic for two underground storage tanks proposed to be installed at Ballard Compressor Station. The Station is located in San Juan County, Section 26, T-26-N, R-9-W, NMPM, 30 miles southeast of Bloomfield.

Each tank will be used for one specific purpose and will be differentiated by referencing them as Tank 1 and Tank 2. Both tanks will be replacing existing underground reinforced fiberglass tanks. Tank 1 will be utilized to collect used and waste oil. The estimated daily discharge into this tank will be approximately 20 gallons per day. The liquids collected will be removed on an as needed basis by El Paso and further processed at our Blanco Plant in Bloomfield. Tank 2 will be used to collect spent glycol and water from the station's dehydration unit. The estimated daily discharge varies greatly with operations, however it is estimated at 5 gallons per day.

The construction and specifications for each tank are identical and described below in further detail. A tank diagram is attached.

> Each tank will be equipped with its own leak detection system. The leak detection observation well will be constructed with 2" PVC. The liner is made of 60 mil oil resistant, high density polyethylene. The capacity for each tank is 50 barrels, constructed with 3/16" steel and coated with coal tar epoxy. The secondary liner will be attached to the tank roof lip, not shown on the tank diagram, to prevent rain water from entering the annular space between the tank and the polyethylene liner.

El Paso proposes to inspect the tank's leak detection sump a least once per month, not to exceed 30 days from the previous inspection date.

El Paso respectfully requests your approval of this plan and will meet with you or agency personnel whenever necessary should more information be necessary. I briefly discussed this matter with Mr. Bill Olson earlier today.

Should you or agency personnel have any information requests, please direct questions to myself at (505) 599-2175.

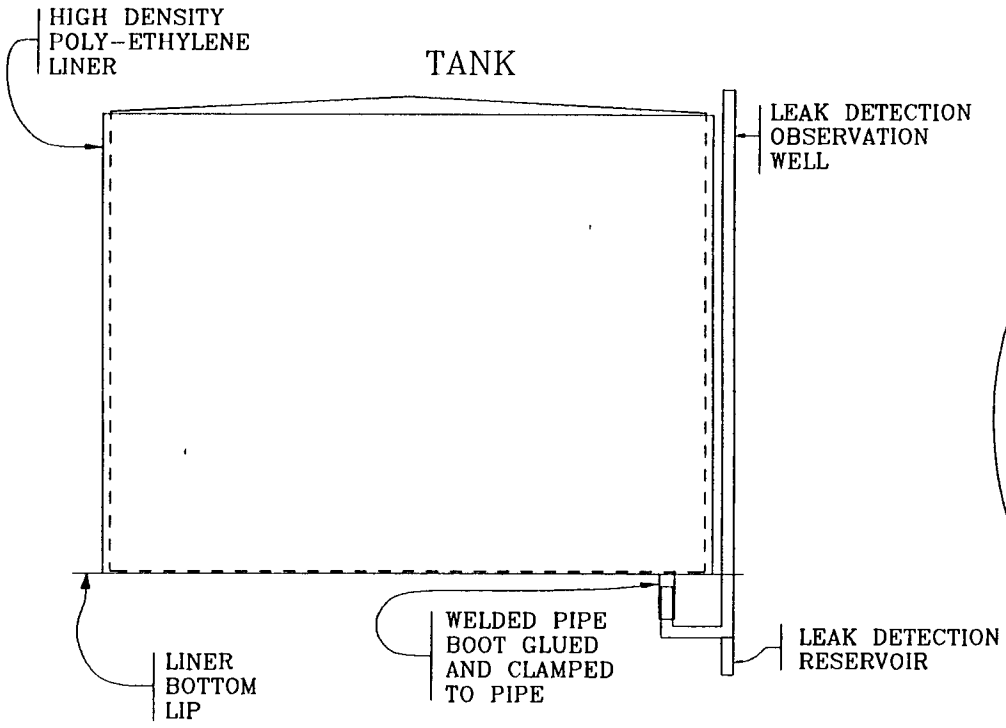
Thank you for your consideration to this matter.

Sincerely,

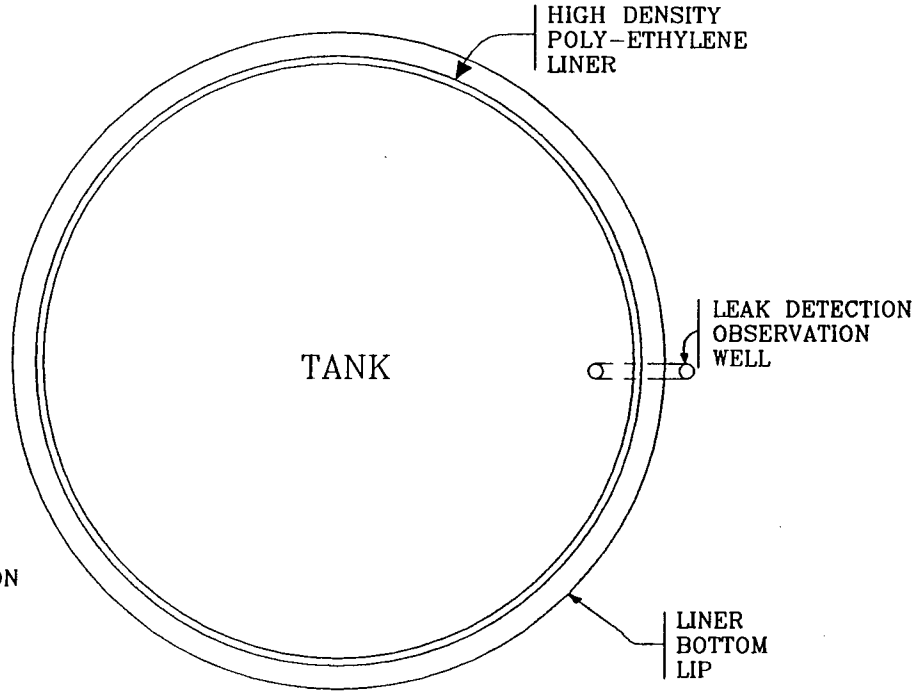
Richard Duarte

Richard Duarte
Compliance Engineer

enclosure



SIDE VIEW



PLAN VIEW

TANK LINER WITH LEAK DETECTION SYSTEM FOR ANY SIZE TANK

ENVIROTECH INC.

ENVIRONMENTAL SCIENTISTS
5796 U.S. HIGHWAY 64-3014
FARMINGTON, NEW MEXICO 87401
PHONE: (505) 632-0615

DESIGNED BY: J. HOGUE
DRAFTED BY: J. DEWEY

PLAN AND SIDE VIEW

SEPTEMBER 6, 1991
SHEET 1